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5 GERALD ARMSTRONG CORPORATION
6
7

FILED

JUN 06 1994

HONORABLE JUDGE
MARIN COUNTY CLERK
BY: E. Keswick, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF MARIN

RECEIVED

JUN 07 1994

10 CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
11 religious corporation,)

No. 157 680

HUB LAW OFFICES

12 Plaintiff,)

SEPARATE STATEMENT OF
REQUESTS FOR PRODUCTION
AND RESPONSES IN DISPUTE

13 vs.)

14 GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION,)
15 a California for-profit)
corporation; DOES 1 through 100,)
16 inclusive,)

Date: 7/1/94
Time: 2:30 p.m.
Dept: Referee W.R. Benz
Trial Date: 9/29/94

17 Defendants.)
18

19 GENERAL OBJECTION

20 Plaintiff objects Generally to the inspection request served
21 by defendant for the production of documents on the following
22 grounds:

23 (1) The document request violates C.C.P sec. 2017. The
24 request is deliberately calculated to impede the progress of the
25 litigation of this matter by posing sixty-two overbroad requests
26 for documents which are not relevant to the subject matter of this
27 action or reasonably calculated to lead to the discovery of
28 admissible evidence.

1 (2) The document request violates C.C.P. Sec. 2019. The
2 document request is overbroad, burdensome and oppressive. For
3 example, defendant seeks settlement agreements and documents which
4 have been sealed by other courts and involved persons not parties
5 to this action. Plaintiff's settlement agreements with other
6 parties are not relevant to any issue in this matter.

7 (3) The document request violates C.C.P. Sec. 2019. The
8 documents sought are obtainable from some other source that is
9 more convenient, less burdensome, and less expensive.

10 (4) The document request violates the plaintiff's and
11 other's privacy rights. Privacy is "an inalienable right " under
12 the California Constitution, Article 1, Section 1. See Britt v.
13 Superior Court (1978) 20 Cal. 3d 844. Disclosure may only be
14 ordered by the court, and only if there is a "compelling state
15 interest." United Farm Workers v. Superior Court (1985) 170 Cal.
16 App. 3d 391.

17 (5) The document request violates Evidence Code Sec. 952.
18 The vast majority of the document request is devoted to requesting
19 documents which are not relevant to any issues in this action,
20 whose inclusion is designed to embarrass plaintiff and prejudice
21 any trier of fact.

22 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

23 (1) The document request is not in violation of C.C.P sec.
24 2017. The request is designed to hasten the progress of the
25 litigation of this matter. The requests are narrow and precise
26 and ask for documents which are completely relevant to the subject
27 matter of this action, or reasonably calculated to lead to the
28 discovery of admissible evidence.

1 (2) The document request is not in violation of C.C.P. Sec.
2 2019. The document request seeks many documents because CSI
3 possesses many documents relevant to this action. The document
4 request is no burden to CSI and in no way oppressive. Armstrong
5 seeks settlement agreements and documents involving other persons
6 CSI has contracted with because they are relevant to this action.

7 (3) The vast majority of the documents sought are not
8 obtainable from some other source that is more convenient, less
9 burdensome, and less expensive. If any specific documents are
10 obtainable from some other source that is more convenient, less
11 burdensome, and less expensive, Armstrong does not expect CSI to
12 produce them; however he does expect CSI to identify and list all
13 such documents.

14 (4) Armstrong is not requesting any documents, the
15 production of which would violate CSI's privacy rights, which are
16 limited by its corporate status, nor the privacy rights of third
17 parties. If there remains a question of privacy after CSI has
18 identified the specific documents for which it claims such right,
19 (which it has not done in its response to Armstrong's first
20 inspection demand), Armstrong will seek a court adjudication of
21 those rights balanced against his need for full discovery from CSI
22 for his defense to CSI's claims and for the fair prosecution of
23 his cross-complaint. CSI does not identify whose "privacy rights"
24 is allegedly violated by this request. Assuming arguendo that CSI
25 is attempting to assert its own privacy interests, "the
26 constitutional provision governing rights to privacy does not
27 apply to corporations but rather, protects privacy rights of
28 people." Roberts v. Gulf Oil Corporation (1983) 147 Cal.App.3d

1 770; 195 Cal.Rptr. 393, 395, 408.

2 (5) The document request does not violates Evidence Code
3 Sec. 952. All documents requested are relevant to the issues in
4 this action. Armstrong does not seek the documents at issue to
5 embarrass plaintiff or prejudice any trier of fact, but seeks only
6 to get to the truth underlying this action as expeditiously as
7 possible in fairness to everyone. It is impossible to litigate
8 this action in the artificial vacuum CSI is trying to create by
9 withholding the mass of relevant documents it possesses.

10 **OBJECTIONS AND RESPONSES**

11 As to the individual categories of documents to be produced,
12 plaintiff responds and objects specifically, without limitation to
13 the general objections noted above, as follows:

14 REQUEST TO PRODUCE DOCUMENTS NO. 1:

15 All documents in CSI's possession which in any way discuss,
16 mention, concern, or relate to Gerald Armstrong; or Gerry
17 Armstrong; or any code name or designation identifying Gerald
18 Armstrong used by CSI or any of the entities or individuals listed
19 or referred to in paragraph 1 of the "Mutual Release of All Claims
20 and Settlement Agreement" of December, 1986, a copy of which is
21 attached to the Complaint in this action as Exhibit A;

22 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 1:

23 Objection. The request is overbroad, burdensome and
24 oppressive. The requested documents exceed the scope of
25 permissible discovery because they are not relevant to any issue
26 in this case, and because their production will not lead to the
27 discovery of admissible evidence. Further, the request is vague
28 and ambiguous as to time. The request is not interposed for any

1 legitimate purpose, but solely to harass CSI. Moreover, the
2 request seeks documents which are privileged pursuant to the
3 attorney-client privilege and the work product doctrine. Further,
4 the request calls for production of documents in violation of the
5 privacy rights of plaintiff and others pursuant to the California
6 and United States constitutions. Moreover, the request seeks
7 documents which are part of the public record as well as documents
8 created by defendant Armstrong, and are equally available to
9 Armstrong. Further, the request seeks to obtain the records of a
10 case which has been ordered sealed by the court having
11 jurisdiction over the underlying action, and seeks to make public
12 record in this action documents which Armstrong agreed, in the
13 settlement agreement which forms the basis for the underlying Los
14 Angeles action, to return to plaintiff, and not discuss, directly
15 to force plaintiff to relinquish this term of the settlement
16 agreement.

17 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

18 Armstrong's answer in this action, which was not demurred or
19 objected to by CSI, contains forty affirmative defenses. He was
20 inside the Scientology organization from 1969 through 1981. He
21 knew L. Ron Hubbard personally, worked directly for him, and did
22 the research for his biography. Since 1981 he has been the
23 organization's target for fair game, black PR, intelligence
24 operations, and abuse of the legal process to augment these
25 systems for Scientology's war against its enemies. CSI and the
26 other entities it claims are beneficiaries of the settlement
27 agreement it seeks to enforce against Armstrong have carried on
28 their war against Armstrong because of his experiences inside the

1 organization. CSI bases the totality of this action on liquidated
2 damages it claims are owed by Armstrong for mentioning his
3 experiences in the organization, in alleged violation of a 1986
4 "settlement agreement" it obtained by fraud and duress. CSI,
5 however, itself discusses Armstrong's experiences, and rewrites
6 them. In its complaint CSI, e.g., calls Armstrong "a former
7 Church member who sought, by both litigation and covert means, to
8 disrupt the activities of his former faith, displayed through the
9 years an intense and abiding hatred for the Church, and an
10 eagerness to annoy and harass his former co-religionists by
11 spreading enmity and hatred among members and former members."
12 (Complaint p. 2, l. 4 - l. 9.) Armstrong contends that CSI's
13 description of him, by which it supports this action, is a lie.
14 He contends that an accurate picture of what he was and is can be
15 obtained from all the documents CSI possesses which concern him.
16 He contends that CSI's description of him stems from the crimes
17 CSI's leaders have committed against him over the years, which
18 crimes will be reflected in the documents he seeks in discovery.
19 The document request is not vague and ambiguous as to time; it
20 seeks all documents which mention, concern or relate to Gerald
21 Armstrong. That is, every document from the earliest to the
22 latest; they are each and every one relevant to this action.
23 Armstrong's cross-complaint covers his experiences inside the
24 Scientology organization and his litigation history with the
25 organization up to present time. CSI supports its demurrer to the
26 cross-complaint with a declaration executed February 8, 1994 by
27 its managing agent and cross-defendant herein, David Miscavige, in
28 which he attacks Armstrong's testimony in 1984 in Armstrong I and

1 claims that the operation he ran against Armstrong to frame him
2 with a crime also in 1984 was "police-sanctioned." CSI cannot
3 expect to itself use Armstrong's past against him in this
4 litigation, and in fact rewrite that past to suit its malevolent
5 purposes, and not produce the storehouse of documents relating to
6 him and its fair game against ^{him} which extends over more than 12
7 years. The Los Angeles Superior Court Armstrong I case is not
8 sealed. Moreover, CSI and its related entities have disregarded
9 all sealing orders which were in place a one time in that very
10 case, and cannot now logically argue that Armstrong should be
11 denied the documents it uses from that case to attack him.
12 Armstrong does not expect CSI to produce any documents which are
13 equally available to him, nor any documents which are legitimately
14 protected by the attorney-client privilege. He does, however,
15 expect CSI to identify and list all such documents. Because
16 Armstrong's need for the documents CSI possesses which mention or
17 relate to him is manifest, this request is not even faintly
18 harassing.

19 REQUEST TO PRODUCE DOCUMENTS NO. 2:

20 The articles of incorporation of CSI and all amendments
21 thereto;

22 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 2:

23 Objection. The requested documents exceed the scope of
24 permissible discovery because they are not relevant to any issue
25 in this case, and because their production will not lead to the
26 discovery of admissible evidence. Moreover, the request seeks
27 documents which are part of the public record and are equally
28 available to Armstrong.

1 Notwithstanding these objections, CSI responds that it will
2 produce documents responsive to this request that are within its
3 possession, custody and control.

4 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

5 The requested documents are relevant to the issues in this
6 case or will lead to the discovery of admissible evidence. The
7 documents are not equally available to Armstrong.

8 CSI has produced documents which, if they are all the
9 documents CSI possesses that are responsive to this request, are
10 acceptable.

11 REQUEST TO PRODUCE DOCUMENTS NO. 3:

12 The by-laws of CSI and all amendments thereto;

13 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 3:

14 Objection. The requested documents exceed the scope of
15 permissible discovery because they are not relevant to any issue
16 in this case, and because their production will not lead to the
17 discovery of admissible evidence.

18 Notwithstanding these objections, CSI responds that it will
19 produce documents responsive to this request that are within its
20 possession, custody and control.

21 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

22 The requested documents are relevant to the issues in this
23 case or will lead to the discovery of admissible evidence. The
24 documents are not equally available to Armstrong.

25 CSI has produced documents which, if they are all the
26 documents CSI possesses that are responsive to this request, are
27 acceptable.
28

1 REQUEST TO PRODUCE DOCUMENTS NO. 4:

2 All minutes of all meetings of the Board of Directors of CSI
3 which mention, concern or relate in any way to Gerald Armstrong;

4 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 4:

5 Objection. The requested documents exceed the scope of
6 permissible discovery because they are not relevant to any issue
7 in this case, and because their production will not lead to the
8 discovery of admissible evidence. Further, the request is not
9 interposed for any legitimate purpose, but solely to harass CSI.
10 Moreover, the request calls for production of documents in
11 violation of the privacy rights of plaintiff and others pursuant
12 to the California and United States constitutions.

13 Notwithstanding these objections, CSI responds that it will
14 produce any non-privileged documents responsive to this request
15 that are within its possession, custody and control.

16 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

17 The requested documents are relevant to the issues in this
18 case or will lead to the discovery of admissible evidence. The
19 request is interposed for a legitimate purpose and is not in the
20 slightest harassing of CSI. It is not in violation of CSI's
21 privacy rights which are limited by its corporate status, nor of
22 any other entities. CSI has not identified those other entities.
23 Although CSI has produced one document in response to this
24 request, it has not identified or listed any of the other
25 documents for which it claims any privilege.

26 REQUEST TO PRODUCE DOCUMENTS NO. 5:

27 All minutes of all meetings of the Board of Directors of CSI
28 which mention, concern or relate in any way to Paul G.

1 Breckenridge, Jr., Michael J. Flynn or Ford Greene.

2 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 5:

3 Objection. The requested documents exceed the scope of
4 permissible discovery because they are not relevant to any issue
5 in this case, and because their production will not lead to the
6 discovery of admissible evidence. The request relates solely to
7 issues which Armstrong attempted to raise in his cross-complaint,
8 which was dismissed by the Court on March 25, 1994, pursuant to
9 CSI's demurrer. Further, CSI objects that the request is annoying
10 and oppressive, and seeks documents with no possible relevance to
11 these proceedings. Moreover, the request calls for production of
12 documents in violation of the privacy rights of plaintiff and
13 others pursuant to the California and United States constitutions.
14 Moreover, the request is not interposed for any legitimate
15 purpose, but solely to harass CSI.

16 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

17 The requested documents are relevant to the issues in this
18 case or will lead to the discovery of admissible evidence. The
19 request is interposed for a legitimate purpose and is not in any
20 way annoying or oppressive. It is not in violation of CSI's
21 privacy rights which are limited by its corporate status, nor of
22 any other entities. CSI has not identified those other entities.
23 The request does not relate solely to Armstrong's cross-complaint.
24 It relates to Armstrong's defenses in the action; see, e.g.,
25 paragraph 1, 32, 52 (Unclean Hands), 57 (Duress and Undue
26 Influence) in Armstrong's Answer. Moreover, Armstrong has filed a
27 Second Amended Cross-Complaint. CSI and its related Scientology
28 entities have carried out years of fair game against opposing

1 attorneys and judges who ruled against Scientology in court
2 proceedings, and spent millions of dollars to accomplish their
3 opponents' ruin. The existence of CSI board minutes authorizing
4 these attacks and the expenditure of these vast sums to accomplish
5 the destruction of perceived enemies is very relevant to
6 Armstrong's case. Flynn was Armstrong's attorney who was
7 compromised by Scientology and passed on its duress to get
8 Armstrong to sign the notorious "1986 settlement agreement."
9 Greene is Armstrong's present attorney which CSI and its agents
10 have subjected to fair game right up to present time. Judge
11 Breckenridge presided over Armstrong's trial in 1984, rendered a
12 decision, upheld on appeal, which condemned fair game, the culling
13 of supposedly confidential psychotherapy files, and the
14 organization's pathological nature. He became fair game. If
15 there are no board minutes reflecting actions taken against Flynn,
16 Greene and Judge Breckenridge, it will tend to prove Armstrong's
17 allegations about the actual structure and command lines of CSI
18 and Scientology which completely ignore corporate structure and
19 corporate channels. See, e.g. Paragraph 46 (Allegation Common to
20 All Affirmative Defenses) in Armstrong's Answer.

21 REQUEST TO PRODUCE DOCUMENTS NO. 6:

22 All minutes of all meetings of the Board of Directors of CSI
23 which mention, concern or relate in any way to "suppressive
24 persons," ("SP's") or "squirrels;" as such terms are commonly
25 understood in Scientology jargon;

26 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 6:

27 Objection. The requested documents exceed the scope of
28 permissible discovery because they are not relevant to any issue

1 in this case, and because their production will not lead to the
2 discovery of admissible evidence. The request relates solely to
3 issues which Armstrong attempted to raise in his cross-complaint,
4 which was dismissed by the Court on March 25, 1994, pursuant to
5 CSI's demurrer. Moreover, the request is not interposed for any
6 legitimate purpose, but solely to harass CSI.

7 Notwithstanding these objections, CSI responds that it has no
8 such documents within its possession, custody and control.

9 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

10 Armstrong asks that CSI reconsider its response that it
11 possesses no such documents. The requested documents would
12 include CSI's adoption of any policies relating to "SPs," etc.,
13 "SP lists," and named individuals CSI considers "SPs" such as
14 Armstrong, Flynn, Greene, Judge Breckenridge, Bent Corydon, Joseph
15 Yanny, Howard Schomer, the FBI, and any individuals or groups on
16 its SP lists, such as Self-Realization Fellowship, EST, etc.

17 REQUEST TO PRODUCE DOCUMENTS NO. 7:

18 All documents in CSI's possession which in any way discuss,
19 mention, concern, relate or refer to The Gerald Armstrong
20 Corporation.

21 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 7:

22 Objection. The request is overbroad, burdensome and
23 oppressive. The requested documents exceed the scope of
24 permissible discovery because they are not relevant to any issue
25 in this case, and because their production will not lead to the
26 discovery of admissible evidence. Further, the request is vague
27 and ambiguous as to time. The request is not interposed for any
28 legitimate purpose, but solely to harass CSI. Moreover, the

1 request seeks documents which are privileged pursuant to the
2 attorney-client privilege and the work product doctrine. Further,
3 the request seeks documents which are part of the public record as
4 well as documents created by defendant Armstrong, and are equally
5 available to Armstrong.

6 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

7 CSI's response is evasive. The requested documents are
8 relevant to the issues in this case or will lead to the discovery
9 of admissible evidence. The request is specific, interposed for a
10 legitimate purpose and is not in any way burdensome or oppressive.
11 The request, asking for all documents which mention or relate to
12 TGAC, is clear as to time. All time up to present time.
13 Armstrong does not expect CSI to produce any documents which are
14 equally available to him, nor any documents which are legitimately
15 protected by the attorney-client or work product privileges. He
16 does, however, expect CSI to identify and list all such documents.
17 Because Armstrong's need for the documents CSI possesses which
18 mention or relate to TGAC, a co-defendant herein, is manifest,
19 this request is not even remotely harassing.

20 REQUEST TO PRODUCE DOCUMENTS NO. 8:

21 All settlement agreements or other contracts entered into by
22 CSI and/or any of the entities or individuals listed or referred
23 to in paragraph 1 of the "Mutual Release of All Claims and
24 Settlement Agreement" of December, 1986, a copy of which is
25 attached to the Complaint in this action as Exhibit A, with each
26 of the following attorneys, litigants or claimants: Michael J.
27 Flynn, Julia Dragojevic, Bruce Bunch, Michael Tabb, Walt Logan,
28 Garry P. McMurry, William Franks, Laurel Sullivan, Howard Schomer,

1 Gabriel Cazares, Nancy McLean, John McLean, Tonja Burden, Margery
2 Wakefield, Edward Walters, Martin Samuels, Nancy Dincalci, Kima
3 Douglas, Michael Douglas, Robert Dardano, Warren Friske, Tonja
4 Burden, and/or Julie Christofferson.

5 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 8:

6 Objection. The requested documents exceed the scope of
7 permissible discovery because they are not relevant to any issue
8 in this case, and because their production will not lead to the
9 discovery of admissible evidence. The request relates solely to
10 issues which Armstrong attempted to raise in his cross-complaint,
11 which was dismissed by the Court on March 25, 1994, pursuant to
12 CSI's demurrer. Further, the request seeks to obtain the records
13 of settlements which have been ordered sealed by the courts having
14 jurisdiction over the underlying actions. Further, CSI objects
15 that the request is annoying and oppressive, and seeks documents
16 with no possible relevance to these proceedings. Moreover, the
17 request is not interposed for any legitimate purpose, but solely
18 to harass CSI.

19 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

20 The requested documents are relevant to the issues in this
21 case or will lead to the discovery of admissible evidence. The
22 request is not annoying, oppressive nor interposed to harass CSI.
23 The request does not relate solely to Armstrong's cross-complaint.
24 It relates to Armstrong's defenses in the action; see, e.g.,
25 paragraph 1, 57 (Duress and Undue Influence), 80 (Mistake of Law),
26 82 (Conflict of Interest) in Armstrong's Answer. Moreover,
27 Armstrong has filed a Second Amended Cross-Complaint. CSI's
28 pronouncement about what "settlement agreements" have been sealed

1 is dissembling. CSI had Armstrong's own attorneys, Michael Flynn,
2 Bruce Bunch and Julia Dragojevic sign such "agreements" to not
3 defend Armstrong if he was attacked by CSI after the
4 "settlements." Such contracts are illegal, and are clearly
5 relevant to Armstrong's defenses in this action. Several of the
6 other named persons also signed "agreements" with CSI, for which
7 there is no case in which the "agreements" can be sealed; e.g.,
8 Laurel Sullivan, William Franks, Edward Walters, Michael Douglas,
9 Kima Douglas, Nancy Dincalci. In other cases it is believed that
10 CSI did not file the "agreements" (as in Armstrong I) and there is
11 no sealing order in place. Additionally, CSI has itself violated
12 any sealing orders (as, e.g., in Armstrong I and Christofferson).
13 The various "contracts" are relevant because they will show that
14 each of the "settling" parties has violated his or her
15 "agreements," and that CSI has selectively chosen Armstrong to
16 attack for no other reasons than to satisfy its hatred for him and
17 because it considers, having "contracted" away his attorneys and
18 his witnesses, and learning that he had renounced his worldly
19 possessions, that it can "safely" do so. The various "contracts"
20 will also support Armstrong's defense based on his attorney's
21 representation at the time of the signing that the prohibitory
22 clauses in the "agreement" "were not worth the papers they were
23 printed on." CSI, moreover, has used the fact that the other
24 "settlement agreements" are "substantially similar" to the
25 Armstrong subject "settlement agreement" to support its efforts to
26 enforce against Armstrong. CSI cannot both use these "settlement
27 agreements" to attack Armstrong and claim that they have no
28 possible relevance to this proceeding, and should therefore

1 produce all these documents.

2 REQUEST TO PRODUCE DOCUMENTS NO. 9:

3 All declarations or affidavits signed by any of the
4 individuals named in paragraph 16 above in connection with or as a
5 part of any settlement entered into between said individuals and
6 CSI or any of the entities or individuals listed or referred to in
7 paragraph 1 of the "Mutual Release of All Claims and Settlement
8 Agreement" of December, 1986, a copy of which is attached to the
9 Complaint in this action as Exhibit A;

10 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 9:

11 Objection. The requested documents exceed the scope of
12 permissible discovery because they are not relevant to any issue
13 in this case, and because their production will not lead to the
14 discovery of admissible evidence. The request relates solely to
15 issues which Armstrong attempted to raise in his cross-complaint,
16 which was dismissed by the Court on March 25, 1994, pursuant to
17 CSI's demurrer. Further, the request seeks to obtain the records
18 of settlements which have been ordered sealed by the courts having
19 jurisdiction over the underlying actions. Further, CSI objects
20 that the request is annoying and oppressive, and seeks documents
21 with no possible relevance to these proceedings. Moreover, the
22 request is not interposed for any legitimate purpose, but solely
23 to harass CSI.

24 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

25 The requested documents are relevant to the issues in this
26 case or will lead to the discovery of admissible evidence. The
27 request is not annoying, oppressive nor interposed to harass CSI.
28 The request does not relate solely to Armstrong's cross-complaint.

1 It relates to Armstrong's defenses in the action; see, e.g.,
2 paragraph 1, 56 (Fraud and Deceit), 57 (Duress and Undue
3 Influence), 67 (Offset), 80 (Mistake of Law), 82 (Conflict of
4 Interest) in Armstrong's Answer. Moreover, Armstrong has filed a
5 Second Amended Cross-Complaint. CSI's averment that the requested
6 documents have been sealed is dishonest. CSI itself filed several
7 such documents in its own cases in open court following the 1986
8 "settlement." Said filing was in direct violation of the promise
9 made to Armstrong by his attorney that these documents would never
10 be used by Scientology. These documents are part of the
11 "consideration" Scientology obtained from Armstrong in the 1986
12 "settlement," and therefore relate to the fairness of the
13 "settlement" and subsequent "damages" claimed by CSI. The
14 requested documents will also support Armstrong's contention that
15 the purposes of the compromise of his attorneys, the "settlement"
16 and CSI's subsequent lawsuits against Armstrong was to obstruct
17 justice, destroy evidence and permit the relatively unfettered
18 fair game assault on Scientology's critics and perceived
19 "enemies."

20 REQUEST TO PRODUCE DOCUMENTS NO. 10:

21 All documents of any kind given to any member of the media or
22 any media company or organization at any time by CSI or any of the
23 entities or individuals listed or referred to in paragraph 1 of
24 the "Mutual Release of All Claims and Settlement Agreement" of
25 December, 1986, a copy of which is attached to the Complaint in
26 this action as Exhibit A, which mention, concern or relate in any
27 way to Gerald Armstrong;
28

1 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 10:

2 Objection. The requested documents exceed the scope of
3 permissible discovery because they are not relevant to any issue
4 in this case, and because their production will not lead to the
5 discovery of admissible evidence. Moreover, the request seeks
6 documents which Armstrong already has in his possession, and are
7 equally available to him. Moreover, the request is not interposed
8 for any legitimate purpose, but solely to harass CSI.

9 Notwithstanding these objections, CSI responds that it will
10 produce documents responsive to this request that are within its
11 possession, custody and control.

12 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

13 The requested documents are relevant to the issues in this
14 case or will lead to the discovery of admissible evidence. CSI is
15 dishonest in its response in that Armstrong possesses none of the
16 documents requested. That this request is interposed to harass
17 CSI is ridiculous. CSI has produced some documents in response to
18 this request. These are, however, but a fraction of all the
19 documents relating to Armstrong given by CSI or the related
20 entities to members of the media. The produced documents, for
21 example, only begin in 1991, whereas CSI's and the related
22 entities' personnel have given documents and materials concerning
23 Armstrong to the media, including "Freedom," since the early
24 1980's. This also includes, e.g., the London Sunday Times and
25 the Los Angeles Times. Documents pursuant to this request which
26 were not produced also include all cover letters which accompanied
27 any dead agent packs, and all editions of all videotapes. CSI
28 must produce all the documents requested.

1 REQUEST TO PRODUCE DOCUMENTS NO. 11:

2 All documents of any kind given to any member of the media or
3 any media company or organization at any time by CSI or any of the
4 entities or individuals listed or referred to in paragraph 1 of
5 the "Mutual Release of All Claims and Settlement Agreement" of
6 December, 1986, a copy of which is attached to the Complaint in
7 this action as Exhibit A, which mention, concern or relate in any
8 way to Michael J. Flynn;

9 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 11:

10 Objection. The requested documents exceed the scope of
11 permissible discovery because they are not relevant to any issue
12 in this case, and because their production will not lead to the
13 discovery of admissible evidence. The request relates solely to
14 issues which Armstrong attempted to raise in his cross-complaint,
15 which was dismissed by the Court on March 25, 1994, pursuant to
16 CSI's demurrer. Moreover, the request is vague, ambiguous,
17 incomprehensible and unintelligible. Further, the request is
18 overbroad, burdensome and oppressive. Moreover, the request is
19 not interposed for any legitimate purpose, but solely to harass
20 CSI.

21 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

22 The requested documents are relevant to the issues in this
23 case or will lead to the discovery of admissible evidence. The
24 request is interposed for a legitimate purpose and is not in any
25 way harassing, burdensome or oppressive. The request is clear,
26 unambiguous, comprehensible and intelligible. The request does
27 not relate solely to Armstrong's cross-complaint. It relates to
28 Armstrong's defenses in the action; see, e.g., paragraph 1, 32, 52

1 (Unclean Hands), 57 (Duress and Undue Influence) in Armstrong's
2 Answer. Moreover, Armstrong has filed a Second Amended Cross-
3 Complaint. CSI and its related Scientology entities carried out
4 years of fair game against attorney Michael Flynn, and gave
5 documents attacking him to media around the world. Flynn was
6 Armstrong's attorney who was compromised by Scientology and passed
7 on its duress to get Armstrong to sign the notorious "1986
8 settlement agreement." The requested documents will support all
9 of Armstrong's defenses and help to provide a context to make why
10 Armstrong's own attorney wanted so desperately to get out the
11 Scientology litigation that he would act as Scientology's de facto
12 agent to get Armstrong to sign the subject "settlement agreement,"
13 why he would himself sign an illegal "contract" with Scientology
14 to not represent Armstrong if he was attacked after the
15 "settlement," and why he would tell Armstrong in order to get him
16 to sign the "agreement" that it was "not worth the paper it was
17 printed on." CSI must produce these documents.

18 REQUEST TO PRODUCE DOCUMENTS NO. 12:

19 All lawsuits, bar complaints or requests for criminal charges
20 filed at any time against Michael J. Flynn by CSI or any of the
21 entities or individuals listed or referred to in paragraph 1 of
22 the "Mutual Release of All Claims and Settlement Agreement" of
23 December, 1986, a copy of which is attached to the Complaint in
24 this action as Exhibit A;

25 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 12:

26 Objection. The requested documents exceed the scope of
27 permissible discovery because they are not relevant to any issue
28 in this case, and because their production will not lead to the

1 discovery of admissible evidence. The request relates solely to
2 issues which Armstrong attempted to raise in his cross-complaint,
3 which was dismissed by the Court on March 25, 1994, pursuant to
4 CSI's demurrer. Moreover, the request is vague, ambiguous,
5 incomprehensible and unintelligible. Further, the request is
6 overbroad, burdensome and oppressive. Moreover, the request is
7 not interposed for any legitimate purpose, but solely to harass
8 CSI. Moreover, the request seeks documents which are part of the
9 public record, and are equally available to Armstrong.

10 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

11 The requested documents are relevant to the issues in this
12 case or will lead to the discovery of admissible evidence. The
13 request is interposed for a legitimate purpose and is not in any
14 way harassing, burdensome or oppressive. The request is clear,
15 unambiguous, comprehensible and intelligible. The request does
16 not relate solely to Armstrong's cross-complaint. It relates to
17 Armstrong's defenses in the action; see, e.g., paragraph 1, 32, 52
18 (Unclean Hands), 57 (Duress and Undue Influence) in Armstrong's
19 Answer. Moreover, Armstrong has filed a Second Amended Cross-
20 Complaint. CSI and its related Scientology entities carried out
21 years of fair game against attorney Michael Flynn, which included,
22 according to Flynn, some fifteen lawsuits, and a dozen bar
23 complaints. CSI carried out a campaign internationally in 1984
24 through 1986 to frame Flynn and have him charged with the forgery
25 an attempt to cash a \$2,000,000.00 check on a bank account of
26 Scientology leader L. Ron Hubbard. Flynn was Armstrong's attorney
27 who was compromised by Scientology and passed on its duress to get
28 Armstrong to sign the notorious "1986 settlement agreement." The

1 requested documents will support all of Armstrong's defenses and
2 help to provide a context to make why Armstrong's own attorney
3 wanted so desperately to get out the Scientology litigation that
4 he would act as Scientology's de facto agent to get Armstrong to
5 sign the subject "settlement agreement," why he would himself sign
6 an illegal "contract" with Scientology to not represent Armstrong
7 if he was attacked after the "settlement," and why he would tell
8 Armstrong in order to get him to sign the "agreement" that it was
9 "not worth the paper it was printed on." CSI must produce these
10 documents.

11 REQUEST TO PRODUCE DOCUMENTS NO. 13:

12 All bar complaints or requests for criminal charges filed at
13 any time against Ford Greene by CSI or any of the entities or
14 individuals listed or referred to in paragraph 1 of the "Mutual
15 Release of All Claims and Settlement Agreement" of December, 1986,
16 a copy of which is attached to the Complaint in this action as
17 Exhibit A;

18 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 13:

19 Objection. The requested documents exceed the scope of
20 permissible discovery because they are not relevant to any issue
21 in this case, and because their production will not lead to the
22 discovery of admissible evidence. The request relates solely to
23 issues which Armstrong attempted to raise in his cross-complaint,
24 which was dismissed by the Court on March 25, 1994, pursuant to
25 CSI's demurrer. Moreover, the request is vague, ambiguous,
26 incomprehensible and unintelligible. Further, the request is
27 overbroad, burdensome and oppressive. Moreover, the request is
28 not interposed for any legitimate purpose, but solely to harass

1 CSI.

2 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

3 The requested documents are relevant to the issues in this
4 case or will lead to the discovery of admissible evidence. The
5 request is interposed for a legitimate purpose and is not in any
6 way harassing, burdensome or oppressive. The request is clear,
7 unambiguous, comprehensible and intelligible. The request does
8 not relate solely to Armstrong's cross-complaint. It relates to
9 Armstrong's defenses in the action; see, e.g., paragraph 1, 49
10 (Association), 52 (Unclean Hands), 66 (Hardship), 67 (Offset), 70
11 (Justification - Defense of Another, Interests of Third Persons,
12 and the Public), 78 (Right to Counsel) in Armstrong's Answer.
13 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
14 CSI and its related Scientology entities carried out years of fair
15 game against Armstrong's former attorney Michael Flynn, which
16 resulted in his compromise and his decision to get out of the
17 Scientology litigation at almost any cost. Now CSI and its
18 related entities have turned their fair game machine to the
19 financial, professional and psychological destruction of
20 Armstrong's present attorney Ford Greene. The requested documents
21 will support all of Armstrong's defenses and provide a context to
22 explain why he would work with Greene at such personal risk to
23 himself. The requested documents will support Armstrong's
24 contention that Scientology's own acts precipitated each of the
25 acts on his part CSI considers breaches of the subject "settlement
26 agreement, " and that CSI has no legitimate claim against
27 Armstrong. Having no legitimate claim of damages in the
28 underlying suits in Los Angeles, CSI has no claim on which to base

1 its fraudulent conveyance claims in this action. Furthermore, by
2 acting to assist Greene who is the target of fair game, Armstrong
3 was in fact defending the creed of Scientology against its own
4 leaders who have disregarded and abused said creed. See, e.g.,
5 paragraph 47 in Armstrong's Answer, first affirmative defense
6 (First Amendment - Religion). CSI must produce these documents.

7 REQUEST TO PRODUCE DOCUMENTS NO. 14:

8 All documents of any kind given to any member of the media or
9 any media company or organization at any time by CSI or any of the
10 entities or individuals listed or referred to in paragraph 1 of
11 the "Mutual Release of All Claims and Settlement Agreement" of
12 December, 1986, a copy of which is attached to the Complaint in
13 this action as Exhibit A, which mention, concern or relate in any
14 way to Judge Paul G. Breckenridge, Jr., or his decision of June
15 20, 1984 in Armstrong I;

16 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 14:

17 Objection. The requested documents exceed the scope of
18 permissible discovery because they are not relevant to any issue
19 in this case, and because their production will not lead to the
20 discovery of admissible evidence. The request relates solely to
21 issues which Armstrong attempted to raise in his cross-complaint,
22 which was dismissed by the Court on March 25, 1994, pursuant to
23 CSI's demurrer. Moreover, the request is vague, ambiguous,
24 incomprehensible and unintelligible. Further, the request is
25 overbroad, burdensome and oppressive. Moreover, the request is
26 not interposed for any legitimate purpose, but solely to harass
27 CSI.

28

1 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

2 The requested documents are relevant to the issues in this
3 case or will lead to the discovery of admissible evidence. The
4 request is interposed for a legitimate purpose and is not in any
5 way harassing, burdensome or oppressive. The request is clear,
6 unambiguous, comprehensible and intelligible. The request does
7 not relate solely to Armstrong's cross-complaint. It relates to
8 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 48
9 (First Amendment - Speech), 52 (Unclean Hands), 54 (Estoppel), 55
10 (Waiver) 56 (Fraud and Deceit), 57 (Duress and Undue Influence),
11 60 (Unfair and Unreasonable Contract), 64 (Unconscionability), 70
12 (Justification - Defense of Another, Interests of Third Persons,
13 and the Public), 73 (Void as Against Public Policy) 77 (Equal
14 Protection), 82 (Conflict of Interest) in Armstrong's Answer.
15 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
16 Judge Breckenridge presided over Armstrong's trial in 1984,
17 rendered a decision, upheld on appeal, which condemned fair game,
18 the culling of supposedly confidential psychotherapy files, and
19 the organization's pathological nature. He became fair game. CSI
20 and its related entities attacked him in the media, going so far
21 as to accuse him of Nazi connections. CSI and its related
22 entities hired a deranged former "intelligence" person to attack
23 the judge and his decision. When the Armstrong I case "settled"
24 in 1986 CSI continued its attack on Judge Breckeridge and the
25 decision, and it continues to this day. CSI has also used,
26 published and distributed documents which were part of the
27 Armstrong I case and which CSI claims were sealed in the case.
28 Meanwhile CSI claims \$50,000 in liquidated damages every time

1 Armstrong mentions any of his experiences which were part of the
2 Armstrong I case, and falsely accuses him of violating the court's
3 alleged sealing orders. The requested documents will show some of
4 the fair game attacks on Judge Breckenridge, CSI's refusal to
5 respect the judiciary or its orders, something of the context in
6 which Armstrong's actions to oppose the fair game are explained.
7 The requested documents are also necessary to show the uneven
8 playing field achieved by Scientology in its litigations, and the
9 threat directed at the judiciary to achieve this uneven field.
10 Scientology's attacks on judges who have the temerity to rule
11 against it are so egregious that they can be by themselves
12 completely dispositive of any lawsuit brought by the organization
13 because no defendant against it can actually obtain fair and
14 impartial justice. CSI must produce these documents.

15 REQUEST TO PRODUCE DOCUMENTS NO. 15:

16 All documents of any kind, including but not limited to
17 orders, project orders, mission orders, program orders, private
18 investigator (PI) orders, intelligence orders, OSA orders,
19 Guardian Office orders, correspondence, reports, compliance
20 reports, daily reports, briefing reports, debriefing reports,
21 statistic reports, battle plans, PI reports, photographs, audio or
22 video recordings, and stolen documents which concern, refer to or
23 form part of any intelligence operations directed at or relating
24 in any way to Gerald Armstrong; including but not limited to the
25 "Gerald Armstrong Project" involving organization operative Dan
26 Sherman; the "Gerald Armstrong Operation" involving operatives
27 Sherman, David Kluge, Mike Rinder and organization private
28 investigator Eugene M. Ingram; the Gerald Armstrong "London

1 operation" involving organization private investigators which
2 culminated in false sworn affidavits accusing defendant of passing
3 stolen documents to Arab agents; the Gerald Armstrong pc folder
4 operation in which organization operative David Kluge attempted to
5 get defendant to accept "stolen" preclear folders; the Gerald
6 Armstrong "Nevada operation" in which organization operative Kluge
7 attempted to get defendant to travel to Nevada for a faked
8 meeting; the Gerald Armstrong "Renee operation" in which
9 operatives Sherman and Kluge set up a meeting between defendant
10 and operative Renee; the "Boston FBI operation" in which
11 organization agents attempted to have the false criminal charge of
12 impersonating an FBI officer brought against defendant; the "LA DA
13 operation" in which organization agents attempted to frame
14 defendant with a crime and then con the District Attorney into
15 filing charges against him; the "Van Schaick operation" in which
16 the Scientology organization used Michael Flynn's client Lavenda
17 Van Schaick to execute a false declaration about defendant for the
18 purpose of bringing a trumped up contempt of court charge against
19 him; the "crooked lawyer operation" where organization operative
20 Kluge took defendant to a Glendale lawyer to discuss a phony plan
21 of bringing a phony lawsuit against the corrupt leadership of the
22 Scientology organization by a phony group of phony reformers;

23 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 15:

24 Objection. The request exceeds the scope of permissible
25 discovery because it is not relevant to any issue in this case,
26 and because it will not lead to the discovery of admissible
27 evidence. Moreover, the request is vague, ambiguous,
28 incomprehensible and unintelligible. Further, the request seeks

1 documents concerning events which never occurred, and so is
2 incapable of response. Moreover, the request is not interposed
3 for any legitimate purpose, but solely to harass CSI.

4 Notwithstanding these objections, CSI responds that it has no
5 such documents within its possession, custody and control.

6 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

7 The requested documents are relevant to the issues in this
8 case or will lead to the discovery of admissible evidence. The
9 request is interposed for a legitimate purpose and is not in any
10 way harassing of CSI. The request is clear, unambiguous,
11 comprehensible and intelligible. The request does not relate
12 solely to Armstrong's cross-complaint. It relates to Armstrong's
13 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
14 (Allegation Common to All Affirmative Defenses) 52 (Unclean
15 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
16 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
17 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
18 - Defense of Another, Interests of Third Persons, and the Public),
19 73 (Void as Against Public Policy), 77 (Equal Protection), 82
20 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
21 has filed a Second Amended Cross-Complaint.

22 CSI's response is a lie. It not only has documents directly
23 responsive to this request, it has a mountain of them. CSI
24 follows the Hubbardian doctrine of schizophrenic
25 compartmentalization whereby it divides up the single entity
26 organization into artificial compartments and moves documents and
27 personnel between the compartments as "necessary" to thwart
28 legitimate discovery by its litigation opponents. Armstrong was

1 Hubbard's intelligence officer on his yacht the "Apollo," and is
2 knowledgeable of this practice. Each of the intelligence
3 operations, or incidents forming part of larger operations, listed
4 in Armstrong's request did occur. CSI and its related entities
5 have used the fruits of these operations against Armstrong, while
6 falsely denying the operations' existence. Pursuant to
7 Scientology's own policies, no actions are undertaken, no
8 operations run, no missions or projects carried out, without
9 specific, detailed written orders based on specific written
10 evaluations. There are literally hundreds of thousands of pages
11 of orders, reports, compliances, briefings and debriefings, stolen
12 documents and related documents concerning operations against or
13 data collected about Armstrong held by CSI or its related
14 entities. This includes computer data, videotapes and audiotapes.
15 The requested documents are potentially dispositive of all actions
16 against Armstrong, and CSI must produce them.

17 REQUEST TO PRODUCE DOCUMENTS NO. 16:

18 All drawings, art, writing, manuscripts, documents, papers,
19 objects, things or materials of any kind stolen from defendant at
20 any time by agents or operatives of CSI or any of the entities or
21 individuals listed or referred to in paragraph 1 of the "Mutual
22 Release of All Claims and Settlement Agreement" of December, 1986,
23 a copy of which is attached to the Complaint in this action as
24 Exhibit A;

25 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 16:

26 Objection. The requested documents exceed the scope of
27 permissible discovery because they are not relevant to any issue
28 in this case, and because their production will not lead to the

1 discovery of admissible evidence. Further, the request is not
2 interposed for any legitimate purpose, but solely to harass CSI.
3 Further, the request seeks documents concerning events which never
4 occurred, and so is incapable of response. CSI further responds
5 that no such documents have ever existed, and are purely a figment
6 of the fertile imagination of Armstrong.

7 Notwithstanding these objections, CSI responds that it has no
8 such documents within its possession, custody and control.

9 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

10 The requested documents are relevant to the issues in this
11 case or will lead to the discovery of admissible evidence. The
12 request is interposed for a legitimate purpose and is not in any
13 way harassing of CSI. CSI's response is dishonest. Its agents
14 stole a briefcase containing a manuscript of original artwork and
15 other documents from Armstrong's car in 1984. CSI's managing
16 agent, David Miscavige, admitted to former organization executive,
17 Vicki Aznaran, that he possessed Armstrong's documents, and he
18 described them to her. CSI's intelligence agents also stole other
19 documents from Armstrong by fraudulently representing themselves
20 to be his friends with an intention to help him. These documents
21 included letters and works of art of various kinds. All of the
22 requested documents are relevant to Armstrong's defenses and his
23 cross-complaint. CSI has these materials, falsely denies their
24 possession with schizophrenic compartmentalization, and continues
25 to abuse Armstrong by not returning his materials. CSI must
26 produce the requested documents.

27 REQUEST TO PRODUCE DOCUMENTS NO. 17:
28

All Guardian Office Intelligence or Information; intel or

1 info (aka B-1) files or documents which in any way or manner
2 mention, concern or relate to Gerald Armstrong;

3 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 17:

4 Objection. The request exceeds the scope of permissible
5 discovery because it is not relevant to any issue in this case,
6 and because it will not lead to the discovery of admissible
7 evidence. The request relates solely to issues which Armstrong
8 attempted to raise in his cross-complaint, which was dismissed by
9 the Court on March 25, 1994, pursuant to CSI's demurrer.
10 Moreover, the request is vague, ambiguous, incomprehensible and
11 unintelligible. Moreover, the request is not interposed for any
12 legitimate purpose, but solely to harass CSI.

13 Notwithstanding these objections, CSI responds that it has no
14 such documents within its possession, custody and control.

15 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

16 The requested documents are relevant to the issues in this
17 case or will lead to the discovery of admissible evidence. The
18 request is interposed for a legitimate purpose and is not in any
19 way harassing, burdensome or oppressive. The request is clear,
20 unambiguous, comprehensible and intelligible. The request does
21 not relate solely to Armstrong's cross-complaint. It relates to
22 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
23 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
24 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
25 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
26 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
27 Defense of Another, Interests of Third Persons, and the Public),
28 73 (Void as Against Public Policy), 77 (Equal Protection), 82

1 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
2 has filed a Second Amended Cross-Complaint.

3 CSI's response is a lie. CSI is the successor corporation to
4 Church of Scientology of California (CSC), which was itself merely
5 an illusory corporate entity in reality inseparable from the whole
6 Scientology organization. According to its "corporate" structure,
7 CSC contained the Guardian's Office (GO) which possessed
8 intelligence, or B-1, files on Armstrong. Indeed, some of the
9 documents from the GO's intelligence bureau were produced by
10 Scientology in the Christofferson case in 1985. CSI follows the
11 Hubbardian doctrine of schizophrenic compartmentalization whereby
12 it divides up the single entity organization into artificial
13 compartments and moves documents and personnel between the
14 compartments as "necessary" to thwart legitimate discovery by its
15 litigation opponents. Armstrong was Hubbard's intelligence
16 officer on his yacht the "Apollo," and is knowledgeable of this
17 practice. Immediately after he left Scientology, the GO ran
18 operations against Armstrong, which included surveillance by its
19 own personnel, surveillance by hired private investigators, and a
20 campaign of intimidation, which included being pushed around by a
21 PI, being run into bodily by a PI, being terrorized on a highway
22 by a PI and being hounded around the clock by PIs. All of the GO
23 personnel and PIs were under the direction of David Miscavige, the
24 same person who runs every aspect of Scientology to this day. CSI
25 must produced the requested documents.

26 REQUEST TO PRODUCE DOCUMENTS NO. 18:

27 All Office of Special Affairs (OSA), files or documents which
28 in any way or manner mention, concern or relate to Gerald

1 Armstrong;

2 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 18:

3 Objection. The requested documents exceed the scope of
4 permissible discovery because they are not relevant to any issue
5 in this case, and because their production will not lead to the
6 discovery of admissible evidence. The request relates solely to
7 issues which Armstrong attempted to raise in his cross-complaint,
8 which was dismissed by the Court on March 25, 1994, pursuant to
9 CSI's demurrer. Further, the request is overbroad, burdensome and
10 oppressive. Moreover, the request is vague, ambiguous,
11 incomprehensible and unintelligible. Further, the request is not
12 interposed for any legitimate purpose, but solely to harass CSI.
13 Further, the request seeks documents which are privileged pursuant
14 to the attorney-client privilege and the work product doctrine.
15 Moreover, the request seeks documents which are part of the public
16 record as well as documents created by defendant Armstrong, and
17 which are equally available to Armstrong.

18 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

19 The requested documents are relevant to the issues in this
20 case or will lead to the discovery of admissible evidence. The
21 request is interposed for a legitimate purpose and is not in any
22 way harassing, burdensome or oppressive. The request is clear,
23 unambiguous, comprehensible and intelligible. The request does
24 not relate solely to Armstrong's cross-complaint. It relates to
25 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
26 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
27 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
28 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and

1 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
2 Defense of Another, Interests of Third Persons, and the Public),
3 73 (Void as Against Public Policy), 77 (Equal Protection), 82
4 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
5 has filed a Second Amended Cross-Complaint.
6 The Office of Special Affairs (OSA) is the successor entity to the
7 Guardian's Office (GO), containing the identical functions of
8 intelligence, public relations and legal. OSA is "corporately"
9 within CSI. CSI knows that Armstrong has no access to OSA's
10 offices or files, and CSI's claim that the requested documents are
11 equally available to Armstrong is dissembling. CSI's averment
12 that the documents requested are part of the public record is
13 equally dissembling. If there are any of OSA's documents
14 concerning Armstrong which have already been used in litigation
15 against Armstrong, produced to him in this action, or are part of
16 the public record, CSI should describe and list them. CSI and its
17 related entities follow a practice of thwarting legitimate
18 discovery by hiding their antisocial and criminal acts against
19 perceived enemies behind illegitimate attorney-client and work
20 product privileges. If there are any documents responsive to this
21 request which are legitimately privileged they should be described
22 and listed. OSA has for years been involved and in present time
23 is involved in attacks on Armstrong. OSA is the arm of the
24 Scientology organization Miscavige uses to collect information on
25 perceived enemies and to attack them in the media, in court and in
26 covert operations. OSA's files and documents which mention or
27 relate in any way to Armstrong must be produced.
28

1 REQUEST TO PRODUCE DOCUMENTS NO. 19:

2 All organization publications, including but not limited to
3 Hubbard Communication Office Bulletins (HCOB's), Hubbard
4 Communication Office Policy Letters (HCOPL's), Executive
5 Directives (ED's), Conditions Orders, Orders, Project Orders,
6 Mission Orders, Program Orders, OSA Orders and Directives,
7 Commodore's Messenger Organization (CMO) Orders and Directives,
8 Religious Technology Center (RTC) Orders and Directives, Church of
9 Spiritual Technology (COST) Orders and Directives, "Freedom" and
10 all other magazines, which in any way or manner whatsoever contain
11 any mention of or concern or relate to Gerald Armstrong;

12 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 19:

13 Objection. The requested documents exceed the scope of
14 permissible discovery because they are not relevant to any issue
15 in this case, and because their production will not lead to the
16 discovery of admissible evidence. Moreover, the request relates
17 solely to issues which Armstrong attempted to raise in his cross-
18 complaint, which was dismissed by the Court on March 25, 1994,
19 pursuant to CSI's demurrer. Further, the request is not
20 interposed for any legitimate purpose, but solely to harass CSI.

21 Notwithstanding these objections, CSI responds that it will
22 produce documents responsive to this request that are within its
23 possession, custody and control.

24 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

25 The requested documents are relevant to the issues in this
26 case or will lead to the discovery of admissible evidence. The
27 request is interposed for a legitimate purpose and is not in any
28 way harassing. The request does not relate solely to Armstrong's

1 cross-complaint. It relates to Armstrong's defenses in the
2 action; see, e.g., paragraph 1, 2, 3, 32, 46 (Allegation Common to
3 All Affirmative Defenses) 52 (Unclean Hands), 56 (Fraud and
4 Deceit), 64 (Unconscionability), 70 (Justification - Defense of
5 Another, Interests of Third Persons, and the Public), 77 (Equal
6 Protection) in Armstrong's Answer. Moreover, Armstrong has filed
7 a Second Amended Cross-Complaint.

8 CSI has produced some documents in response to this request,
9 but this production is woefully inadequate. CSI has produced a
10 copy of one of several "Freedom" magazines which concern
11 Armstrong. CSI produced a few Sea Organization "Conditions
12 Orders" and "Personnel Orders" from the 1970's, but no OSA orders,
13 no Executive Directives, no RTC orders or directives, no project
14 or mission orders. CSI's response is evasive and dissembling.
15 The requested documents are relevant to Armstrong's defenses in
16 this action and must be produced.

17 REQUEST TO PRODUCE DOCUMENTS NO. 20:

18 All documents of any kind given to any member of the
19 Government, or any government agency or organ at any time by CSI
20 or any of the entities or individuals listed or referred to in
21 paragraph 1 of the "Mutual Release of All Claims and Settlement
22 Agreement" of December, 1986, a copy of which is attached to the
23 Complaint in this action as Exhibit A, which mention, concern or
24 relate in any way to Gerald Armstrong;

25 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 20:

26 Objection. The requested documents exceed the scope of
27 permissible discovery because they are not relevant to any issue
28 in this case, and because their production will not lead to the

1 discovery of admissible evidence. The request relates solely to
2 issues which Armstrong attempted to raise in his cross-complaint,
3 which was dismissed by the Court on March 25, 1994, pursuant to
4 CSI's demurrer. Moreover, the request is vague, ambiguous,
5 incomprehensible and unintelligible in that "Government," and
6 "government agency or organ" are not defined. Moreover, the
7 request is not interposed for any legitimate purpose, but solely
8 to harass CSI.

9 Notwithstanding these objections, and to the extent that it
10 understands this request, CSI responds that it will produce
11 documents responsive to this request that are within its
12 possession, custody and control.

13 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

14 The requested documents are relevant to the issues in this
15 case or will lead to the discovery of admissible evidence. The
16 request is interposed for a legitimate purpose and is not in any
17 way harassing, burdensome or oppressive. The request is clear,
18 unambiguous, comprehensible and intelligible. CSI is dissembling
19 regarding what "government" or "government organ" means, since it
20 appears to understand these terms in the partial injunction
21 entered May 28, 1992, in Armstrong II. The request does not
22 relate solely to Armstrong's cross-complaint. It relates to
23 Armstrong's defenses in the action; see, e.g., paragraph 1, 32, 52
24 (Unclean Hands), 54 (Estoppel), 55 (Waiver), 56 (Fraud and
25 Deceit), 57 (Duress and Undue Influence), 60 (Unfair and
26 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
27 - Defense of Another, Interests of Third Persons, and the Public),
28 73 (Void as Against Public Policy), 77 (Equal Protection), in

1 Armstrong's Answer. Moreover, Armstrong has filed a Second
2 Amended Cross-Complaint.

3 CSI has produced one document in response to this request.
4 This is unacceptable. The document itself is incomplete, being
5 merely part of one document, and lacking any indication as to whom
6 it went to in the government. This is also not the only document
7 CSI or its related entities have at any time given to any
8 government agency or organ which mention, concern or relate in any
9 way to Gerald Armstrong. CSI must produce all its documents in
10 response to this request.

11 REQUEST TO PRODUCE DOCUMENTS NO. 21:

12 All documents of any kind which mention, concern or relate in
13 any way to Mission Corporate Category Sort-out, including, but not
14 limited to the audio recordings, and all written transcripts
15 thereof, which are commonly known as the "MCCS Tapes," and which
16 have been the subject of litigation known as US v. Zolin;

17 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 21:

18 Objection. The requested documents exceed the scope of
19 permissible discovery because they are not relevant to any issue
20 in this case, and because their production will not lead to the
21 discovery of admissible evidence. The request relates solely to
22 issues which Armstrong attempted to raise in his cross-complaint,
23 which was dismissed by the Court on March 25, 1994, pursuant to
24 CSI's demurrer. Further, the request is not interposed for any
25 legitimate purpose, but solely to harass CSI. Further, the
26 request seeks documents which are privileged pursuant to the
27 attorney-client privilege and the work product doctrine. In
28 addition, the request seeks documents which have been placed under

1 the seal of the Los Angeles Superior Court.

2 Armstrong can have no legitimate basis for requesting
3 production of these documents. The requested audiotapes are
4 recordings of privileged conferences between officials of the
5 Church of Scientology of California and their attorneys, relating
6 to a project that took place during the years 1980 and 1981, ten
7 years prior to any of the events at issue in this action. Nothing
8 on those tapes bears any relevance to Armstrong's conveyance of
9 his assets in 1990. Armstrong's only connection to these
10 audiotapes is that he stole them in 198_ from non-party Church of
11 Scientology of California. Further, the litigation which he
12 cites, United States v. Zolin, has been settled. Neither the IRS
13 nor anyone else is contesting the privileges raised by the Church
14 of Scientology of California in regard to these tapes. Moreover,
15 CSI does not have possession, custody and control of the requested
16 tapes or transcripts thereof.

17 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

18 The requested documents are relevant to the issues in this
19 case or will lead to the discovery of admissible evidence. The
20 request is interposed for a legitimate purpose and is not in any
21 way harassing. The request does not relate solely to Armstrong's
22 cross-complaint. It relates to Armstrong's defenses in the
23 action; see, e.g., paragraph 1, 46 (Allegation Common to All
24 Affirmative Defenses), 52 (Unclean Hands), 54 (Estoppel), 55
25 (Waiver), 56 (Fraud and Deceit), 57 (Duress and Undue Influence),
26 70 (Justification - Defense of Another, Interests of Third
27 Persons, and the Public) in Armstrong's Answer. Moreover,
28 Armstrong has filed a Second Amended Cross-Complaint. The

1 requested materials have been part of CSI and its related
2 entities' attacks on Armstrong since the 1986 "settlement," which
3 CSI evidences here when it falsely accuses Armstrong in its
4 response of stealing the tapes. CSI made the same false charge
5 after the "settlement" all the way up to the US Supreme Court,
6 after contracting with Armstrong's attorney so that it could make
7 the charge unimpeded. The requested materials also contain the
8 admissions of Scientology's top personnel that the organization
9 has a unity of control and that its leader completely ignores
10 corporate lines, structures and formalities. Armstrong worked on
11 the MCCS project and knows about Scientology's plans to
12 corporately restructure the organization to allow its leader to
13 control and manage it while being shielded from liability for his
14 orders and other acts. Judge Breckenridge found in his 1984
15 decision in Armstrong I that "this court is satisfied that LRH
16 runs the Church in all ways through the Sea Organization, his role
17 of Commodore, and the Commodore's Messengers." Although Hubbard
18 died in 1986 now Miscavige runs the organization through the same
19 Sea Org and the same command lines and policies set up by Hubbard.
20 CSI and its related entities still protests the Breckenridge
21 decision, and still calls Armstrong a liar. The MCCS materials
22 will show that Armstrong is not lying about organization
23 structure, unity of control and organizational disregard for
24 corporate structures. Since there is a complete unity of control,
25 CSI has access to and can produce the requested materials, and
26 should do so.

27 REQUEST TO PRODUCE DOCUMENTS NO. 22:
28

All orders from anyone in CSI to anyone in CSI or outside of

1 CSI which in any way mention, concern or relate to Gerald
2 Armstrong;

3 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 22:

4 Objection. The request exceeds the scope of permissible
5 discovery because it is not relevant to any issue in this case,
6 and because it will not lead to the discovery of admissible
7 evidence. The request relates solely to issues which Armstrong
8 attempted to raise in his cross-complaint, which was dismissed by
9 the Court on March 25, 1994, pursuant to CSI's demurrer.
10 Further, the request is not interposed for any legitimate purpose,
11 but solely to harass CSI.

12 Notwithstanding these objections, CSI responds that it has no
13 such documents within its possession, custody and control.

14 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

15 The requested documents are relevant to the issues in this
16 case or will lead to the discovery of admissible evidence. The
17 request is interposed for a legitimate purpose and is not in any
18 way harassing. The request does not relate solely to Armstrong's
19 cross-complaint. It relates to Armstrong's defenses in the
20 action; see, e.g., paragraph 1, 3, 46 (Allegation Common to All
21 Affirmative Defenses), 52 (Unclean Hands), 54 (Estoppel), 55
22 (Waiver), 56 (Fraud and Deceit), 57 (Duress and Undue Influence),
23 67 (Offset), 70 (Justification - Defense of Another, Interests of
24 Third Persons, and the Public) in Armstrong's Answer. Moreover,
25 Armstrong has filed a Second Amended Cross-Complaint.

26 That no one in CSI has issued any order to anyone which in
27 any way mention, concern or relate to Gerald Armstrong is a
28 mountainous lie. CSI follows the Hubbardian doctrine of

1 schizophrenic compartmentalization whereby it divides up the
2 single entity organization into artificial compartments and moves
3 documents and personnel between the compartments as "necessary" to
4 thwart legitimate discovery by its litigation opponents.
5 Armstrong was Hubbard's intelligence officer on his yacht the
6 "Apollo," and is knowledgeable of this practice. Pursuant to
7 Scientology's own policies every order must be in writing. The
8 idea that in all the operations that have been run by CSI and its
9 related entities against Armstrong (see 15 above), in all the
10 publications it has put out concerning Armstrong, and regarding
11 the "1986 settlement," three lawsuits and two contempt of court
12 efforts subsequently, there have been no orders to anyone is
13 simply not believable. If CSI is attempting to dodge this
14 document request because its orders are issued via computer,
15 please see the definition of "document" in Armstrong's inspection
16 demand. CSI must produce the requested documents.

17 REQUEST TO PRODUCE DOCUMENTS NO. 23:

18 All orders from anyone outside of CSI to anyone in CSI or not
19 which in any way mention, concern or relate to Gerald Armstrong;

20 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 23:

21 Objection. The request exceeds the scope of permissible
22 discovery because it is not relevant to any issue in this case,
23 and because it will not lead to the discovery of admissible
24 evidence. Moreover, the request relates solely to issues which
25 Armstrong attempted to raise in his cross-complaint, which was
26 dismissed by the Court on March 25, 1994, pursuant to CSI's
27 demurrer. Further, the request is not interposed for any
28 legitimate purpose, but solely to harass CSI.

1 Notwithstanding these objections, CSI responds that it has no
2 such documents within its possession, custody and control.

3 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

4 The requested documents are relevant to the issues in this
5 case or will lead to the discovery of admissible evidence. The
6 request is interposed for a legitimate purpose and is not in any
7 way harassing. The request does not relate solely to Armstrong's
8 cross-complaint. It relates to Armstrong's defenses in the
9 action; see, e.g., paragraph 1, 3, 46 (Allegation Common to All
10 Affirmative Defenses), 52 (Unclean Hands), 54 (Estoppel), 55
11 (Waiver), 56 (Fraud and Deceit), 57 (Duress and Undue Influence),
12 67 (Offset), 70 (Justification - Defense of Another, Interests of
13 Third Persons, and the Public) in Armstrong's Answer. Moreover,
14 Armstrong has filed a Second Amended Cross-Complaint.

15 That no one in CSI has received no orders from anyone which
16 in any way mention, concern or relate to Gerald Armstrong is a
17 mountainous lie. CSI follows the Hubbardian doctrine of
18 schizophrenic compartmentalization whereby it divides up the
19 single entity organization into artificial compartments and moves
20 documents and personnel between the compartments as "necessary" to
21 thwart legitimate discovery by its litigation opponents.
22 Armstrong was Hubbard's intelligence officer on his yacht the
23 "Apollo," and is knowledgeable of this practice. Pursuant to
24 Scientology's own policies every order must be in writing. The
25 idea that in all the operations that have been run by CSI and its
26 related entities against Armstrong (see 15 above), in all the
27 publications it has put out concerning Armstrong, and regarding
28 the "1986 settlement," three lawsuits and two contempt of court

1 efforts subsequently, there have been no orders from anyone is
2 simply not believable. It is well known that CSI's operations are
3 under Miscavige and his circle of RTC/WDC/Inspector General staff,
4 that Miscavige personally oversees operations against the
5 organization's "enemies." Although part of the monolithic
6 Scientology organization, Miscavige and CSI consider for "legal"
7 purposes that he and RTC/WDC/Inspector Generals are "outside"
8 CSI, and the request for production should be answered
9 accordingly. If CSI is attempting to dodge this document request
10 because its orders are issued via computer, please see the
11 definition of "document" in Armstrong's inspection demand. CSI
12 must produce the requested documents.

13 REQUEST TO PRODUCE DOCUMENTS NO. 24:

14 All compliance reports, staff member reports, battle plans,
15 target reports, daily reports, ethics reports, mission reports,
16 project reports, program reports or any other reports of any kind
17 whatsoever to or from anyone in CSI or any of the entities or
18 individuals listed or referred to in paragraph 1 of the "Mutual
19 Release of All Claims and Settlement Agreement" of December, 1986,
20 a copy of which is attached to the Complaint in this action as
21 Exhibit A, which mention, concern or relate in any way to Gerald
22 Armstrong;

23 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 24:

24 Objection. The requested documents exceed the scope of
25 permissible discovery because they are not relevant to any issue
26 in this case, and because their production will not lead to the
27 discovery of admissible evidence. Moreover, the request is vague,
28 ambiguous, incomprehensible and unintelligible. Further, the

1 request is overbroad, burdensome and oppressive. Moreover, the
2 request relates solely to issues which Armstrong attempted to
3 raise in his cross-complaint, which was dismissed by the Court on
4 March 25, 1994, pursuant to CSI's demurrer. Further, the request
5 is not interposed for any legitimate purpose, but solely to harass
6 CSI. Moreover, the request calls for production of documents in
7 violation of the privacy rights of plaintiff and others pursuant
8 to the California and United States constitutions.
9 Notwithstanding these objections, and to the extent that it
10 understands this request, CSI responds that it will produce any
11 non-privileged documents responsive to this request that are
12 within its possession, custody and control.

13 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

14 The requested documents are relevant to the issues in this
15 case or will lead to the discovery of admissible evidence. The
16 request is interposed for a legitimate purpose and is not in any
17 way harassing, burdensome or oppressive. The request is clear,
18 unambiguous, comprehensible and intelligible. The request does
19 not relate solely to Armstrong's cross-complaint. It relates to
20 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
21 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
22 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
23 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
24 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
25 Defense of Another, Interests of Third Persons, and the Public),
26 73 (Void as Against Public Policy), 77 (Equal Protection), 82
27 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
28 has filed a Second Amended Cross-Complaint. Armstrong is not

1 requesting any documents, the production of which would violate
2 CSI's privacy rights, which are limited by its corporate status,
3 nor the privacy rights of third parties. If there remains a
4 question of privacy after CSI has identified the specific
5 documents for which it claims such right, Armstrong will seek a
6 court adjudication of those rights balanced against his need for
7 full discovery from CSI for his defense to CSI's claims and for
8 the fair prosecution of his cross-complaint.

9 CSI has produced some documents in response to this request.
10 This production is unacceptable. CSI has chosen some of the items
11 from Armstrong's Sea Org "ethics" files, while deleting from that
12 period L. Ron Hubbard's orders regarding Armstrong, all
13 Armstrong's mission or project files, comm ev files, etc. CSI has
14 also not included any of the mountain of reports, orders, etc.
15 regarding operations against Armstrong, intelligence data
16 collected, briefings, debriefings, etc. following Armstrong's
17 departure from the Sea Org. If CSI is attempting to dodge this
18 document request because its orders are issued via computer,
19 please see the definition of "document" in Armstrong's inspection
20 demand. CSI must produce the requested documents.

21 REQUEST TO PRODUCE DOCUMENTS NO. 25:

22 All documents and materials of any kind removed by Vicki
23 Aznaran or anyone else, acting or not on orders from CSI or any of
24 the entities or individuals listed or referred to in paragraph 1
25 of the "Mutual Release of All Claims and Settlement Agreement" of
26 December, 1986, a copy of which is attached to the Complaint in
27 this action as Exhibit A, from Gerald Armstrong's, aka Gerry
28 Armstrong, pc folders; aka preclear filers or folders, auditing or

1 processing files or folders, and/or confessional formularies, in
2 anticipation or not of their delivery, or not, to the Los Angeles
3 Superior Court pursuant or not to any order from any judge of that
4 Court, or for any other reason;

5 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 25:

6 Objection. The requested documents exceed the scope of
7 permissible discovery because they are not relevant to any issue
8 in this case, and because their production will not lead to the
9 discovery of admissible evidence. Further, the request is
10 overbroad, burdensome and oppressive. Moreover, the request
11 relates solely to issues which Armstrong attempted to raise in his
12 cross-complaint, which was dismissed by the Court on March 25,
13 1994, pursuant to CSI's demurrer. Further, the request is not
14 interposed for any legitimate purpose, but solely to harass CSI.

15 Notwithstanding these objections, CSI responds that it has no
16 such documents within its possession, custody and control. CSI
17 further responds that no such documents have ever existed, and are
18 purely a figment of the fertile imagination of anti-Scientology
19 litigant Vicki Aznaran.

20 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

21 The requested documents are relevant to the issues in this
22 case or will lead to the discovery of admissible evidence. The
23 request is interposed for a legitimate purpose and is not in any
24 way harassing, burdensome or oppressive. The request does not
25 relate solely to Armstrong's cross-complaint. It relates to
26 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
27 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
28 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and

1 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
2 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
3 Defense of Another, Interests of Third Persons, and the Public),
4 77 (Equal Protection), in Armstrong's Answer. Moreover, Armstrong
5 has filed a Second Amended Cross-Complaint. Vicki Aznaran has
6 stated in several sworn affidavits that, in anticipation of
7 production of Armstrong's preclear folders in the Armstrong I
8 litigation pursuant to an order of Judge Breckenridge, she was
9 ordered to go through said folders and remove anything which might
10 be helpful to Armstrong or harmful to Scientology. Ms. Aznaran
11 states that she did as ordered and did remove such materials.
12 Clearly the documents requested are relevant to all of Armstrong's
13 defenses because they support his contentions regarding the
14 purposes of Scientology's litigations, and form part of the trial
15 picture Scientology was facing with Armstrong's cross-complaint in
16 early 1987, and thus go to the actual consideration Scientology
17 obtained in the "settlement" with Armstrong. CSI must produce
18 these documents.

19 REQUEST TO PRODUCE DOCUMENTS NO. 26:

20 All correspondence, orders, policies, programs, projects,
21 directives, mission orders, press releases, briefing sheets,
22 reports, or documents of any kind which mention, concern or relate
23 in any way to Los Angeles Superior Court Judge Paul G.
24 Breckenridge, Jr.;

25 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 26:

26 Objection. The requested documents exceed the scope of
27 permissible discovery because they are not relevant to any issue
28 in this case, and because their production will not lead to the

1 discovery of admissible evidence. The request relates solely to
2 issues which Armstrong attempted to raise in his cross-complaint,
3 which was dismissed by the Court on March 25, 1994, pursuant to
4 CSI's demurrer. Moreover, the request is vague, ambiguous,
5 incomprehensible and unintelligible. Further, the request is
6 overbroad, burdensome and oppressive. Moreover, the request is
7 not interposed for any legitimate purpose, but solely to harass
8 CSI.

9 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

10 The requested documents are relevant to the issues in this
11 case or will lead to the discovery of admissible evidence. The
12 request is interposed for a legitimate purpose and is not in any
13 way harassing, burdensome or oppressive. The request is clear,
14 unambiguous, comprehensible and intelligible. The request does
15 not relate solely to Armstrong's cross-complaint. It relates to
16 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
17 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
18 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
19 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
20 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
21 Defense of Another, Interests of Third Persons, and the Public),
22 73 (Void as Against Public Policy), 77 (Equal Protection), 82
23 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
24 has filed a Second Amended Cross-Complaint. Judge Breckenridge
25 presided over Armstrong's trial in 1984, rendered a decision,
26 upheld on appeal, which condemned fair game, the culling of
27 supposedly confidential psychotherapy files, and the
28 organization's pathological nature. He became fair game. CSI and

1 its related entities attacked him in the media, going so far as to
2 accuse him of Nazi connections. CSI and its related entities
3 hired a deranged former "intelligence" person to attack the judge
4 and his decision. When the Armstrong I case "settled" in 1986 CSI
5 continued its attack on Judge Breckeridge and the decision, and it
6 continues to this day. CSI has also used, published and
7 distributed documents which were part of the Armstrong I case and
8 which CSI claims were sealed in the case. Meanwhile CSI claims
9 \$50,000 in liquidated damages every time Armstrong mentions any of
10 his experiences which were part of the Armstrong I case, and
11 falsely accuses him of violating the court's alleged sealing
12 orders. The requested documents will show some of the fair game
13 attacks on Judge Breckenridge, CSI's refusal to respect the
14 judiciary or its orders, and something of the context in which
15 Armstrong's actions to oppose the fair game are explained. The
16 requested documents are also necessary to show the uneven playing
17 field achieved by Scientology in its litigations, and the threat
18 directed at the judiciary to achieve this uneven field.
19 Scientology's attacks on judges who have the temerity to rule
20 against it are so egregious that they can be by themselves
21 completely dispositive of any lawsuit brought by the organization
22 because no defendant against it can actually obtain fair and
23 impartial justice. CSI must produce these documents.

24 REQUEST TO PRODUCE DOCUMENTS NO. 27:

25 All correspondence, orders, policies, programs, projects,
26 directives, mission orders, press releases, briefing sheets,
27 reports, or documents of any kind which mention, concern or relate
28 in any way to Michael J. Flynn;

1 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 27:

2 Objection. The requested documents exceed the scope of
3 permissible discovery because they are not relevant to any issue
4 in this case, and because their production will not lead to the
5 discovery of admissible evidence. The request relates solely to
6 issues which Armstrong attempted to raise in his cross-complaint,
7 which was dismissed by the Court on March 25, 1994, pursuant to
8 CSI's demurrer. Moreover, the request is vague, ambiguous,
9 incomprehensible and unintelligible. Moreover, the request is not
10 interposed for any legitimate purpose, but solely to harass CSI.
11 Moreover, the request seeks documents which are part of the public
12 record as well as documents created by defendant Armstrong, and
13 which are equally available to Armstrong. Further, the request
14 seeks documents which are privileged pursuant to the attorney-
15 client privilege and the work product doctrine.

16 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

17 The requested documents are relevant to the issues in this
18 case or will lead to the discovery of admissible evidence. The
19 request is interposed for a legitimate purpose and is not in any
20 way harassing of CSI. The request is clear, unambiguous,
21 comprehensible and intelligible. The request does not relate
22 solely to Armstrong's cross-complaint. It relates to Armstrong's
23 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
24 (Allegation Common to All Affirmative Defenses) 52 (Unclean
25 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
26 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
27 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
28 - Defense of Another, Interests of Third Persons, and the Public),

1 73 (Void as Against Public Policy), 77 (Equal Protection), 82
2 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
3 has filed a Second Amended Cross-Complaint. CSI and its related
4 Scientology entities carried out years of fair game against
5 attorney Michael Flynn, which generated mountains of documents
6 including "evaluations," mission orders, project orders, telexes,
7 reports, and related documents. Flynn was Scientology's number
8 one "enemy" and Armstrong's attorney. He was compromised by
9 Scientology and passed on its duress to get Armstrong to sign the
10 notorious "1986 settlement agreement." The requested documents
11 will support all of Armstrong's defenses and help to provide a
12 context to make why Armstrong's own attorney wanted so desperately
13 to get out the Scientology litigation that he would act as
14 Scientology's de facto agent to get Armstrong to sign the subject
15 "settlement agreement," why he would himself sign an illegal
16 "contract" with Scientology to not represent Armstrong if he was
17 attacked after the "settlement," and why he would tell Armstrong
18 in order to get him to sign the "agreement" that it was "not worth
19 the paper it was printed on." CSI must produce these documents.
20 Any documents for which CSI claims a privilege must be described
21 and listed.

22 REQUEST TO PRODUCE DOCUMENTS NO. 28:

23 All correspondence orders, policies, programs, projects,
24 directives, mission orders, press releases, briefing sheets,
25 reports, or documents of any kind which mention, concern or relate
26 in any way to Ford Greene;

27 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 28:
28

Objection. The requested documents exceed the scope of

1 permissible discovery because they are not relevant to any issue
2 in this case, and because their production will not lead to the
3 discovery of admissible evidence. The request relates solely to
4 issues which Armstrong attempted to raise in his cross-complaint,
5 which was dismissed by the Court on March 25, 1994, pursuant to
6 CSI's demurrer. Moreover, the request is vague, ambiguous,
7 incomprehensible and unintelligible. Further, the request is
8 overbroad, burdensome and oppressive. Moreover, the request is
9 not interposed for any legitimate purpose, but solely to harass
10 CSI.

11 Moreover, the request seeks documents which are part of the
12 public record as well as documents created by defendant Armstrong,
13 and which are equally available to Armstrong. Further, the
14 request seeks documents which are privileged pursuant to the
15 attorney-client privilege and the work product doctrine.

16 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

17 The requested documents are relevant to the issues in this
18 case or will lead to the discovery of admissible evidence. The
19 request is interposed for a legitimate purpose and is not in any
20 way harassing, burdensome or oppressive. The request is clear,
21 unambiguous, comprehensible and intelligible. The request does
22 not relate solely to Armstrong's cross-complaint. It relates to
23 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
24 32, 46 (Allegation Common to All Affirmative Defenses), 49
25 (Association), 52 (Unclean Hands), 70 (Justification - Defense of
26 Another, Interests of Third Persons, and the Public), 77 (Equal
27 Protection), 78 (Right to Counsel) in Armstrong's Answer.
28 Moreover, Armstrong has filed a Second Amended Cross-Complaint.

1 CSI and its related Scientology entities carried out years of fair
2 game against Armstrong's former attorney Michael Flynn, which
3 resulted in his compromise and his decision to get out of the
4 Scientology litigation at almost any cost. Now CSI and its
5 related entities have turned their fair game machine to the
6 financial, professional and psychological destruction of
7 Armstrong's present attorney Ford Greene. CSI bases this action
8 on a claim it says it has for Armstrong daring to work in Greene's
9 office. The requested documents will support all of Armstrong's
10 defenses and provide a context to explain why he would work with
11 Greene at such personal risk to himself. The requested documents
12 will support Armstrong's contention that Scientology's own acts
13 precipitated each of the acts on his part CSI considers breaches
14 of the subject "settlement agreement," and that CSI has no
15 legitimate claim against Armstrong. Having no legitimate claim of
16 damages in the underlying suits in Los Angeles, CSI has no claim
17 on which to base its fraudulent conveyance claims in this action.
18 Furthermore, by acting to assist Greene who is the target of fair
19 game, Armstrong was in fact defending the creed of Scientology
20 against its own leaders who have disregarded and abused said
21 creed. See, e.g., paragraph 47 in Armstrong's Answer, first
22 affirmative defense (First Amendment - Religion). CSI must
23 produce these documents. Any documents for which CSI claims a
24 privilege, or which CSI claims were created by Armstrong or are
25 equally available to Armstrong must be described and listed.

26 REQUEST TO PRODUCE DOCUMENTS NO. 29:

27 All correspondence, orders, policies, programs, projects,
28 directives, mission orders, press releases, briefing sheets,

1 reports, or documents of any kind which mention, concern or relate
2 in any way to Michael Walton;

3 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 29:

4 Objection. The requested documents exceed the scope of
5 permissible discovery because they are not relevant to any issue
6 in this case, and because their production will not lead to the
7 discovery of admissible evidence. The request relates solely to
8 issues which Armstrong attempted to raise in his cross-complaint,
9 which was dismissed by the Court on March 25, 1994, pursuant to
10 CSI's demurrer. Moreover, the request is vague, ambiguous,
11 incomprehensible and unintelligible. Further, the request is
12 overbroad, burdensome and oppressive. Moreover, the request is
13 not interposed for any legitimate purpose, but solely to harass
14 CSI.

15 Moreover, the request seeks documents which are part of the
16 public record as well as documents created by defendant Armstrong,
17 and which are equally available to Armstrong. Further, the
18 request seeks documents which are privileged pursuant to the
19 attorney-client privilege and the work product doctrine.

20 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

21 The requested documents are relevant to the issues in this
22 case or will lead to the discovery of admissible evidence. The
23 request is interposed for a legitimate purpose and is not in any
24 way harassing, burdensome or oppressive. The request is clear,
25 unambiguous, comprehensible and intelligible. The request does
26 not relate solely to Armstrong's cross-complaint. It relates to
27 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
28 32, 46 (Allegation Common to All Affirmative Defenses), 49

1 (Association), 52 (Unclean Hands), 70 (Justification - Defense of
2 Another, Interests of Third Persons, and the Public), 77 (Equal
3 Protection), 78 (Right to Counsel) in Armstrong's Answer.
4 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
5 CSI and its related Scientology entities carried out years of fair
6 game against Armstrong's former attorney Michael Flynn, which
7 resulted in his compromise and his decision to get out of the
8 Scientology litigation at almost any cost. CSI and its related
9 entities have turned their fair game machine to the financial,
10 professional and psychological destruction of Armstrong's present
11 attorney Ford Greene. But not content with that, CSI has begun a
12 fair game campaign with this action against Michael Walton,
13 another of Armstrong's attorneys. Scientology has taken Walton's
14 depositions in Armstrong I, II and IV. The organization is trying
15 to take away his house, and is causing him and his family
16 unwarranted problems for no other reasons than to satisfy its
17 insane determination to destroy Armstrong, and because it has the
18 wealth and fair game machinery to do so. The requested
19 documents will show that CSI has no legitimate claim against
20 Walton, and that he and his family are targets of fair game. CSI
21 must produce these documents. Any documents for which CSI claims
22 a privilege, or which CSI claims were created by Armstrong or are
23 equally available to Armstrong must be described and listed.

24 REQUEST TO PRODUCE DOCUMENTS NO. 30:

25 All correspondence, orders, policies, programs, projects,
26 directives, mission orders, press releases, briefing sheets,
27 reports, or documents of any kind which mention, concern or relate
28 in any way to Eugene M. Ingram.

1 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 30:

2 Objection. The requested documents exceed the scope of
3 permissible discovery because they are not relevant to any issue
4 in this case, and because their production will not lead to the
5 discovery of admissible evidence. The request relates solely to
6 issues which Armstrong attempted to raise in his cross-complaint,
7 which was dismissed by the Court on March 25, 1994, pursuant to
8 CSI's demurrer. Moreover, the request is vague, ambiguous,
9 incomprehensible and unintelligible. Further, the request is
10 overbroad, burdensome and oppressive. Moreover, the request is
11 not interposed for any legitimate purpose, but solely to harass
12 CSI.

13 Moreover, the request seeks documents which are part of the
14 public record as well as documents created by defendant Armstrong,
15 and which are equally available to Armstrong. Further, the
16 request seeks documents which are privileged pursuant to the
17 attorney-client privilege and the work product doctrine.

18 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

19 The requested documents are relevant to the issues in this
20 case or will lead to the discovery of admissible evidence. The
21 request is interposed for a legitimate purpose and is not in any
22 way harassing, burdensome or oppressive. The request is clear,
23 unambiguous, comprehensible and intelligible. The request does
24 not relate solely to Armstrong's cross-complaint. It relates to
25 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
26 32, 46 (Allegation Common to All Affirmative Defenses), 49
27 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
28 (Duress and Undue Influence), 67 (Offset), 70 (Justification -

1 Defense of Another, Interests of Third Persons, and the Public),
2 77 (Equal Protection), 78 (Right to Counsel) in Armstrong's
3 Answer. Moreover, Armstrong has filed a Second Amended Cross-
4 Complaint. Ingram has been CSI's and its related Scientology
5 entities' main private investigator for over a decade. He was
6 booted out of the Los Angeles Police Department for taking bribes
7 from drug dealers and running prostitutes. Then Hubbard and
8 Scientology hired him to bully its critics and "enemies." Ingram
9 was responsible for the fair game attacks on Michael Flynn which
10 included framing him with the forgery of the \$2,000,000 check on a
11 Hubbard account and the hiring of convicted felons to attack
12 Flynn. Ingram's acts against Flynn resulted in Flynn's compromise
13 and the betrayal of Armstrong in the notorious 1986 "settlement."
14 Ingram was responsible for the attempted entrapment of Armstrong,
15 for the procurement of phony LAPD authorizations to illegally wire
16 tap and videotape Armstrong. Ingram threatened to put a bullet
17 between Armstrong's eyes, and spread the false story that he has
18 AIDS. Ingram has carried out his mandate to bully the
19 organization's perceived "enemies" and has attacked and
20 intimidated many innocent individuals. CSI hides Ingram's
21 outrageous, dangerous and illegal activities behind unmerited
22 "privileges." CSI must produce these documents. Any documents
23 for which CSI claims a privilege, or which CSI claims were created
24 by Armstrong or are equally available to Armstrong must be
25 described and listed.

26 REQUEST TO PRODUCE DOCUMENTS NO. 31:

27 Any and all Flag Conditions Orders (FCO's) or any other
28 Conditions Orders or Ethics Orders of any kind which mention,

1 refer or relate in any way to "Suppressive Persons," aka "SP's",
2 or anyone labelled "suppressive, a "suppressive person," or "SP;"

3 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 31:

4 Objection. The requested documents exceed the scope of
5 permissible discovery because they are not relevant to any issue
6 in this case, and because their production will not lead to the
7 discovery of admissible evidence. The request relates solely to
8 issues which Armstrong attempted to raise in his cross-complaint,
9 which was dismissed by the Court on March 25, 1994, pursuant to
10 CSI's demurrer. Moreover, the request is vague, ambiguous,
11 incomprehensible and unintelligible. Further, the request is
12 overbroad, burdensome and oppressive. Moreover, the request is
13 not interposed for any legitimate purpose, but solely to harass
14 CSI. Moreover, the request calls for production of documents in
15 violation of the privacy and association rights of plaintiff and
16 others pursuant to the California and United States constitutions.
17 Further, the request seeks documents in violation of the right of
18 plaintiff and its parishioners to freely practice their religion
19 pursuant to the First Amendment to the United States Constitution.

20 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

21 The requested documents are relevant to the issues in this
22 case or will lead to the discovery of admissible evidence. The
23 request is interposed for a legitimate purpose and is not in any
24 way harassing, burdensome or oppressive. The request is clear,
25 unambiguous, comprehensible and intelligible. The request does
26 not relate solely to Armstrong's cross-complaint. It relates to
27 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
28 32, 46 (Allegation Common to All Affirmative Defenses), 49

1 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
2 (Duress and Undue Influence), 67 (Offset), 70 (Justification -
3 Defense of Another, Interests of Third Persons, and the Public),
4 77 (Equal Protection), 78 (Right to Counsel) in Armstrong's
5 Answer. Moreover, Armstrong has filed a Second Amended Cross-
6 Complaint. Scientology's policies on how it views and treats what
7 it calls "suppressive persons" or "SP's" are central to its years
8 of fair game toward Armstrong and his attorneys. The declaring of
9 someone a "suppressive person," which CSI and its related entities
10 do with a document called a "Conditions Order" of "Declare" is a
11 terrifying experience to anyone so "declared." Pursuant to the
12 fair game doctrine, judicially recognized and condemned, someone
13 declared a "suppressive person" may be tricked, sued, cheated,
14 lied to and destroyed. To carry out this attack up to and
15 including destruction, CSI and its related entities use
16 sophisticated intelligence methods Hubbard patterned after Nazi
17 spy chief Reinhard Gehlen, public relations "tech" Hubbard called
18 "black PR," and bullying, which includes using the legal process
19 to harass and ruin. The importance of the policies and orders
20 relating to SP's is that they must be followed to the letter by
21 all Scientology personnel, or the non-complying personnel
22 themselves will become labelled "suppressives" and themselves
23 become fair game. These policies and orders also set up a state
24 of mind in Scientologists which makes it laudable to trick, cheat,
25 lie to, bully and destroy labelled "suppressives." Judge
26 Breckenridge found the Scientology organization "paranoid and
27 schizophrenic." These organizational psychological
28 characteristics flow from the antisocial, criminal and dangerous

1 policies concerning SP's. This is the danger that Armstrong has
2 faced since he left Scientology. It is the danger that caused
3 Michael Flynn to betray his responsibilities as an officer of the
4 court in order to escape. And it is the danger which has brought
5 Armstrong to defend himself and others after the 1986
6 "settlement." Thus CSI's and its related entities policies and
7 orders concerning "SP's" are inescapably part of this litigation.
8 CSI must produce these documents. The requested documents will
9 not in any way prevent CSI and its "parishioners" from practicing
10 their "religion." Any documents for which CSI claims a privilege,
11 or which CSI claims were created by Armstrong or are equally
12 available to Armstrong must be described and listed.

13 REQUEST TO PRODUCE DOCUMENTS NO. 32:

14 Any and all HCOB's, PL's, Directives, Orders, Conditions
15 Orders, Program Orders, Project Orders, Missions Orders, GO
16 Orders, OSA Orders or Directives, WDC Orders or Directives, RTC
17 Orders or Directives, or any other issue type, whether canceled or
18 revised at any time, which mention, refer to or relate in any way
19 to SP's and/or the treatment or handling of SP's;

20 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 32:

21 Objection. The requested documents exceed the scope of
22 permissible discovery because they are not relevant to any issue
23 in this case, and because their production will not lead to the
24 discovery of admissible evidence. The request relates solely to
25 issues which Armstrong attempted to raise in his cross-complaint,
26 which was dismissed by the Court on March 25, 1994, pursuant to
27 CSI's demurrer. Moreover, the request is vague, ambiguous,
28 incomprehensible and unintelligible. Further, the request is

1 overbroad, burdensome and oppressive. Moreover, the request is
2 not interposed for any legitimate purpose, but solely to harass
3 CSI.

4 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

5 The requested documents are relevant to the issues in this
6 case or will lead to the discovery of admissible evidence. The
7 request is interposed for a legitimate purpose and is not in any
8 way harassing, burdensome or oppressive. The request is clear,
9 unambiguous, comprehensible and intelligible. The request does
10 not relate solely to Armstrong's cross-complaint. It relates to
11 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
12 32, 46 (Allegation Common to All Affirmative Defenses), 49
13 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
14 (Duress and Undue Influence), 67 (Offset), 70 (Justification -
15 Defense of Another, Interests of Third Persons, and the Public),
16 77 (Equal Protection), 78 (Right to Counsel) in Armstrong's
17 Answer. Moreover, Armstrong has filed a Second Amended Cross-
18 Complaint. Scientology's policies on how it views and treats what
19 it calls "suppressive persons" or "SP's" are central to its years
20 of fair game toward Armstrong and his attorneys. Pursuant to the
21 fair game doctrine, judicially recognized and condemned, someone
22 declared a "suppressive person" may be tricked, sued, cheated,
23 lied to and destroyed. To carry out this attack up to and
24 including destruction, CSI and its related entities use
25 sophisticated intelligence methods Hubbard patterned after Nazi
26 spy chief Reinhard Gehlen, public relations "tech" Hubbard called
27 "black PR," and bullying, which includes using the legal process
28 to harass and ruin. The importance of the policies and orders

1 relating to SP's is that they must be followed to the letter by
2 all Scientology personnel, or the non-complying personnel
3 themselves will become labelled "suppressives" and themselves
4 become fair game. These policies and orders also set up a state
5 of mind in Scientologists which makes it laudable to trick, cheat,
6 lie to, bully and destroy labelled "suppressives." Judge
7 Breckenridge found the Scientology organization "paranoid and
8 schizophrenic." These organizational psychological
9 characteristics flow from the antisocial, criminal and dangerous
10 policies concerning SP's. This is the danger that Armstrong has
11 faced since he left Scientology. It is the danger that caused
12 Michael Flynn to betray his responsibilities as an officer of the
13 court in order to escape. And it is the danger which has brought
14 Armstrong to defend himself and others after the 1986
15 "settlement." Thus CSI's and its related entities policies and
16 orders concerning "SP's" are inescapably part of this litigation.
17 CSI must produce these documents.

18 REQUEST TO PRODUCE DOCUMENTS NO. 33:

19 Any and all HCOB's, PL's, Directives, Orders, Conditions
20 Orders, Program Orders, Project Orders, Missions Orders, GO
21 Orders, OSA Orders or Directives, WDC Orders or Directives, RTC
22 Orders or Directives, or any other issue type, whether canceled or
23 revised at any time, which mention, refer to or relate in any way
24 to "squirrels" as that term is commonly understood in Scientology
25 jargon;

26 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 33:

27 Objection. The requested documents exceed the scope of
28 permissible discovery because they are not relevant to any issue

1 in this case, and because their production will not lead to the
2 discovery of admissible evidence. The request relates solely to
3 issues which Armstrong attempted to raise in his cross-complaint,
4 which was dismissed by the Court on March 25, 1994, pursuant to
5 CSI's demurrer. Moreover, the request is vague, ambiguous,
6 incomprehensible and unintelligible. Further, the request is
7 overbroad, burdensome and oppressive. Moreover, the request is
8 not interposed for any legitimate purpose, but solely to harass
9 CSI.

10 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

11 The requested documents are relevant to the issues in this
12 case or will lead to the discovery of admissible evidence. The
13 request is interposed for a legitimate purpose and is not in any
14 way harassing, burdensome or oppressive. The request is clear,
15 unambiguous, comprehensible and intelligible. The request does
16 not relate solely to Armstrong's cross-complaint. It relates to
17 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
18 32, 46 (Allegation Common to All Affirmative Defenses), 49
19 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
20 (Duress and Undue Influence), 67 (Offset), 70 (Justification -
21 Defense of Another, Interests of Third Persons, and the Public),
22 77 (Equal Protection), 78 (Right to Counsel) in Armstrong's
23 Answer. Moreover, Armstrong has filed a Second Amended Cross-
24 Complaint. CSI labelled Armstrong a "squirrel" in a black PR
25 publication "OSA International Executive Directive No. 19." CSI
26 claimed therein, for the purpose of stirring up hatred against
27 Armstrong within its ranks that his actions "are destructive and
28 aimed at the enslavement rather than the freedom of man."

1 Scientology claims that "squirrels" are those who use its
2 "technology" without authorization. Scientology teaches its
3 members to hate "squirrels." This hatred generated by CSI and its
4 related entities pervades the way they have dealt with Armstrong,
5 and in fact underlie this lawsuit. Armstrong contends that he is
6 not is "squirrel," that he has been deliberately and falsely
7 labelled, and that CSI urges its members to hate him because he is
8 vulnerable and CSI and its related enemies "need" enemies they can
9 beat on to satisfy their antisocial needs and to keep their
10 minions brainwashed and dominated. These documents must be
11 produced.

12 REQUEST TO PRODUCE DOCUMENTS NO. 34:

13 Any and all HCOB's, PL's, Directives, Orders, Conditions
14 Orders, Program Orders, Project Orders, Missions Orders, GO
15 Orders, OSA Orders or Directives, WDC Orders or Directives, RTC
16 Orders or Directives, or any other issue type, whether canceled or
17 revised at any time, which mention, refer to or relate in any way
18 to the non-Scientology justice system of the United States or any
19 other nation (aka "wog justice");

20 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 34:

21 Objection. The requested documents exceed the scope of
22 permissible discovery because they are not relevant to any issue
23 in this case, and because their production will not lead to the
24 discovery of admissible evidence. The request relates solely to
25 issues which Armstrong attempted to raise in his cross-complaint,
26 which was dismissed by the Court on March 25, 1994, pursuant to
27 CSI's demurrer. Moreover, the request is vague, ambiguous,
28 incomprehensible and unintelligible. Further, the request is

1 overbroad, burdensome and oppressive. Moreover, the request is
2 not interposed for any legitimate purpose, but solely to harass
3 CSI.

4 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

5 The requested documents are relevant to the issues in this
6 case or will lead to the discovery of admissible evidence. The
7 request is interposed for a legitimate purpose and is not in any
8 way harassing, burdensome or oppressive. The request is clear,
9 unambiguous, comprehensible and intelligible. The request does
10 not relate solely to Armstrong's cross-complaint. It relates to
11 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
12 32, 46 (Allegation Common to All Affirmative Defenses), 49
13 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
14 (Duress and Undue Influence), 67 (Offset), 70 (Justification -
15 Defense of Another, Interests of Third Persons, and the Public),
16 77 (Equal Protection), 78 (Right to Counsel) in Armstrong's
17 Answer. Moreover, Armstrong has filed a Second Amended Cross-
18 Complaint. Scientology policies and orders direct its members to
19 hate justice and the justice systems of the world. CSI and its
20 related entities attack opposing lawyers and impartial judges,
21 intimidate juries, and demonstrate every day their contempt for
22 justice; while comparing it to Scientology's brand of justice
23 which is inquisitorial, secretive, non-appealable and dangerous.
24 CSI and its related entities attacks on the justice system skew
25 any litigation in which they become involved, and they become
26 involved in much because they are able to skew it and gain
27 undeserved advantages to facilitate their attacks on their many
28 perceived enemies. The requested policies are relevant to show

1 how Scientology generates this hatred for "wog justice" and for an
2 understanding of how it can get its minions, even its lawyers, to
3 lie and abuse the system. CSI must produce these documents.

4 REQUEST TO PRODUCE DOCUMENTS NO. 38:

5 Any and all HCOB's, PL's, Directives, Orders, Conditions
6 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
7 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
8 Directives, or any other issue type, whether canceled or revised
9 at any time which mention, refer to or relate in any way to
10 litigation, litigating and using the courts and law, or "wog
11 courts" or "wog justice" system to harass;

12 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 38:

13 Objection. The requested documents exceed the scope of
14 permissible discovery because they are not relevant to any issue
15 in this case, and because their production will not lead to the
16 discovery of admissible evidence. The request relates solely to
17 issues which Armstrong attempted to raise in his cross-complaint,
18 which was dismissed by the Court on March 25, 1994, pursuant to
19 CSI's demurrer. Moreover, the request is vague, ambiguous,
20 incomprehensible and unintelligible. Moreover, the request is not
21 interposed for any legitimate purpose, but solely to harass CSI.

22 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

23 The requested documents are relevant to the issues in this
24 case or will lead to the discovery of admissible evidence. The
25 request is interposed for a legitimate purpose and is not in any
26 way harassing of CSI. The request is clear, unambiguous,
27 comprehensible and intelligible. The request does not relate
28 solely to Armstrong's cross-complaint. It relates to Armstrong's

1 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
2 (Allegation Common to All Affirmative Defenses), 49 (Association),
3 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57 (Duress and
4 Undue Influence), 67 (Offset), 70 (Justification - Defense of
5 Another, Interests of Third Persons, and the Public), 77 (Equal
6 Protection), 78 (Right to Counsel) in Armstrong's Answer.
7 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
8 Scientology policies and orders direct its members to hate justice
9 and the justice systems of the world. Hubbard ordered his
10 followers to "use the law to harass," and use it to "ruin
11 utterly." This is exactly what CSI is trying to do in its
12 litigations against Armstrong. It is what it and its related
13 entities did to his former attorney Michael Flynn, suing him some
14 fifteen times and harassing him until he was "ruined" and was
15 forced to betray his responsibilities as a lawyer. CSI and its
16 related entities attack opposing lawyers and impartial judges,
17 intimidate juries, and demonstrate every day their contempt for
18 justice; while comparing it to Scientology's brand of justice
19 which is inquisitorial, secretive, non-appealable and dangerous.
20 CSI and its related entities attacks on the justice system skew
21 any litigation in which they become involved, and they become
22 involved in much because they are able to skew it and gain
23 undeserved advantages to facilitate their attacks on their many
24 perceived enemies. The requested policies are relevant to show
25 how Scientology generates this hatred for "wog justice" and for an
26 understanding of how it can get its minions, even its lawyers, to
27 lie and abuse the system. CSI must produce these documents.
28

REQUEST TO PRODUCE DOCUMENTS NO. 39:

1 Any and all HCOB's, PL's, Directives, Orders, Conditions
2 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
3 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
4 Directives, or any other issue type, whether canceled or revised
5 at any time which mention, refer to or relate in any way to
6 private investigators, their hiring, their operating or running,
7 and their use against perceived enemies or opponents of
8 Scientology, by CSI or any of the entities or individuals listed
9 or referred to in paragraph 1 of the "Mutual Release of All Claims
10 and Settlement Agreement" of December, 1986, a copy of which is
11 attached to the Complaint in this action as Exhibit A;

12 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 39:

13 Objection. The requested documents exceed the scope of
14 permissible discovery because they are not relevant to any issue
15 in this case, and because their production will not lead to the
16 discovery of admissible evidence. The request relates solely to
17 issues which Armstrong attempted to raise in his cross-complaint,
18 which was dismissed by the Court on March 25, 1994, pursuant to
19 CSI's demurrer. Moreover, the request is vague, ambiguous,
20 incomprehensible and unintelligible. Moreover, the request is not
21 interposed for any legitimate purpose, but solely to harass CSI.

22 Notwithstanding these objections, CSI responds that it has no
23 such documents within its possession, custody and control.

24 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

25 The requested documents are relevant to the issues in this
26 case or will lead to the discovery of admissible evidence. The
27 request is interposed for a legitimate purpose and is not in any
28 way harassing of CSI. The request is clear, unambiguous,

1 comprehensible and intelligible. The request does not relate
2 solely to Armstrong's cross-complaint. It relates to Armstrong's
3 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
4 (Allegation Common to All Affirmative Defenses), 49 (Association),
5 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57 (Duress and
6 Undue Influence), 67 (Offset), 70 (Justification - Defense of
7 Another, Interests of Third Persons, and the Public), 77 (Equal
8 Protection), 78 (Right to Counsel) in Armstrong's Answer.
9 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
10 CSI and its related entities use squads of PIs against their
11 perceived "enemies." Armstrong was attacked by their PIs when he
12 left the organization, has been threatened by their PIs, illegally
13 photographed, videotaped and wiretapped by their PIs, slandered by
14 their PIs, and harassed by their PIs even since moving to Marin.
15 CSI must produce the requested documents.

16 CSI's claim that it has no such documents is a lie. Hubbard
17 wrote several directives and policies about PIs. CSI and the rest
18 of Scientology do not do anything which is not pursuant to written
19 policy. PIs are so central to their attacks on perceived enemies,
20 and are used in so many situations against so many people or
21 groups, that there are thousands of policies and orders relating
22 to the subject. CSI's response is not believable.

23 REQUEST TO PRODUCE DOCUMENTS NO. 40:

24 Any and all HCOB's, PL's, Directives, Orders, Conditions
25 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
26 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
27 Directives, or any other issue type, whether canceled or revised
28 at any time which mention, refer to or relate in any way to

1 penalties or ethics penalties, or punishment or ethics punishment;

2
3 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 40:

4
5 Objection. The requested documents exceed the scope of
6 permissible discovery because they are not relevant to any issue
7 in this case, and because their production will not lead to the
8 discovery of admissible evidence. The request relates solely to
9 issues which Armstrong attempted to raise in his cross-complaint,
10 which was dismissed by the Court on March 25, 1994, pursuant to
11 CSI's demurrer. Moreover, the request is vague, ambiguous,
12 incomprehensible and unintelligible. Further, the request is
13 overbroad, burdensome and oppressive. Moreover, the request is
14 not interposed for any legitimate purpose, but solely to harass
15 CSI. Moreover, the request calls for production of documents in
16 violation of the privacy and association rights of plaintiff and
17 others pursuant to the California and United States constitutions.
18 Further, the request seeks documents in violation of the right of
19 plaintiff and its parishioners to freely practice their religion
20 pursuant to the First Amendment to the United States Constitution.

21 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

22 The requested documents are relevant to the issues in this
23 case or will lead to the discovery of admissible evidence. The
24 request is interposed for a legitimate purpose and is not in any
25 way harassing, burdensome or oppressive. The request is clear,
26 unambiguous, comprehensible and intelligible. The request does
27 not relate solely to Armstrong's cross-complaint. It relates to
28 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,

1 32, 46 (Allegation Common to All Affirmative Defenses), 49
2 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
3 (Duress and Undue Influence), 67 (Offset), 70 (Justification -
4 Defense of Another, Interests of Third Persons, and the Public),
5 77 (Equal Protection), in Armstrong's Answer. Moreover, Armstrong
6 has filed a Second Amended Cross-Complaint. Scientology's
7 policies and orders regarding penalties or ethics penalties, or
8 punishment or ethics punishment are relevant to all of Armstrong's
9 defenses and an understanding of what underlies this litigation.
10 Scientologists and Scientology lawyers will lie and cheat as
11 ordered by the organization's leaders because of the threat of
12 extreme punishment for non-compliance. Scientology calls this
13 punishment "ethics," although it is anything but ethical.
14 Scientologists' and the organization's lawyers' lies pervade and
15 skew this litigation. The threat generated by the organization's
16 "ethics" orders and policies is a major factor in this action, and
17 CSI must produce the requested documents. The requested documents
18 will not in any way prevent CSI and its "parishioners" from
19 practicing their "religion." Any documents for which CSI claims a
20 privilege must be described and listed.

21 REQUEST TO PRODUCE DOCUMENTS NO. 41:

22 Any and all HCOB's, PL's, Directives, Orders, Conditions
23 Orders, Program Orders, Project Orders, Mission Orders, GO Orders,
24 OSA Orders or Directives, WDC Orders or Directives, RTC Orders or
25 Directives, or any other issue type, whether canceled or revised
26 at any time which mention, refer to or relate in any way to mental
27 health, mental healing, knowledge of mental health and healing,
28 and/or the taking over, intended taking over or domination of the

1 field of mental health by Scientology or the Scientology
2 organization;

3 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 41:

4 Objection. The requested documents exceed the scope of
5 permissible discovery because they are not relevant to any issue
6 in this case, and because their production will not lead to the
7 discovery of admissible evidence. The request relates solely to
8 issues which Armstrong attempted to raise in his cross-complaint,
9 which was dismissed by the Court on March 25, 1994, pursuant to
10 CSI's demurrer. Moreover, the request is vague, ambiguous,
11 incomprehensible and unintelligible. Further, the request is
12 overbroad, burdensome and oppressive. Moreover, the request is
13 not interposed for any legitimate purpose, but solely to harass
14 CSI.

15 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

16 The requested documents are relevant to the issues in this
17 case or will lead to the discovery of admissible evidence. The
18 request is interposed for a legitimate purpose and is not in any
19 way harassing, burdensome or oppressive. The request is clear,
20 unambiguous, comprehensible and intelligible. The request does
21 not relate solely to Armstrong's cross-complaint. It relates to
22 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
23 32, 46 (Allegation Common to All Affirmative Defenses), 49
24 (Association), 50 (Press), 52 (Unclean Hands), 54 (Estoppel), 55
25 (Waiver), 56 (Fraud and Deceit), 57 (Duress and Undue Influence),
26 67 (Offset), 70 (Justification - Defense of Another, Interests of
27 Third Persons, and the Public), 77 (Equal Protection), in
28 Armstrong's Answer. Moreover, Armstrong has filed a Second

1 Amended Cross-Complaint. Scientology's policies and orders
2 regarding its intention and plan to take over the field of mental
3 health or mental healing are relevant because that intention and
4 plan, even though based on madness, are basic to all of CSI's
5 litigations's against Armstrong. The leaders who run CSI and its
6 related entities see Armstrong as a major impediment to their
7 drive to take over the mental health field and grab the wealth
8 such a takeover would bring. Armstrong documented and exposed the
9 fraud of L. Ron Hubbard and his organization. Armstrong says and
10 can prove philosophically and mathematically, without even
11 considering its trail of victims, that Scientology does not work.
12 For this he is hated by these leaders, considered a threat to
13 their mad drive for domination, and sued whenever they see an
14 opportunity. CSI must produce the requested documents.

15 REQUEST TO PRODUCE DOCUMENTS NO. 42:

16 All documents of any kind on which plaintiff based its
17 publication " Squirrels" which listed defendant as one of six such
18 "squirrels;"

19 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 42:

20 Objection. The requested documents exceed the scope of
21 permissible discovery because they are not relevant to any issue
22 in this case, and because their production will not lead to the
23 discovery of admissible evidence. The request relates solely to
24 issues which Armstrong attempted to raise in his cross-complaint,
25 which was dismissed by the Court on March 25, 1994, pursuant to
26 CSI's demurrer. Moreover, the request is vague, ambiguous,
27 incomprehensible and unintelligible. Further, the request is
28 overbroad, burdensome and oppressive. Moreover, the request is

1 not interposed for any legitimate purpose, but solely to harass
2 CSI.

3 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

4 The requested documents are relevant to the issues in this
5 case or will lead to the discovery of admissible evidence. The
6 request is interposed for a legitimate purpose and is not in any
7 way harassing, burdensome or oppressive. The request is clear,
8 unambiguous, comprehensible and intelligible. The request does
9 not relate solely to Armstrong's cross-complaint. It relates to
10 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
11 32, 46 (Allegation Common to All Affirmative Defenses), 49
12 (Association), 50 (Press), 52 (Unclean Hands), 54 (Estoppel), 55
13 (Waiver), 56 (Fraud and Deceit), 57 (Duress and Undue Influence),
14 67 (Offset), 70 (Justification - Defense of Another, Interests of
15 Third Persons, and the Public), 77 (Equal Protection), in
16 Armstrong's Answer. Moreover, Armstrong has filed a Second
17 Amended Cross-Complaint. CSI labelled Armstrong a "squirrel" in a
18 black PR publication "OSA International Executive Directive No.
19 19." CSI claimed therein, for the purpose of stirring up hatred
20 against Armstrong within its ranks that his actions "are
21 destructive and aimed at the enslavement rather than the freedom
22 of man." Scientology claims that "squirrels" are those who use
23 its "technology" without authorization. Scientology teaches its
24 members to hate "squirrels." This hatred generated by CSI and its
25 related entities pervades the way they have dealt with Armstrong,
26 and in fact underlie this lawsuit. Armstrong contends that he is
27 not is "squirrel," that he has been deliberately and falsely
28 labelled, and that CSI urges its members to hate him because he is

1 vulnerable and CSI and its related enemies "need" enemies they can
2 beat on to satisfy their antisocial needs and to keep their
3 minions brainwashed and dominated. It was important enough to CSI
4 that Armstrong was a "squirrel" that it published internationally
5 OSA Int ED 19. This attack on Armstrong underlies and predates
6 all the actions he took for which CSI claims damages on which it
7 bases this action. Armstrong contends that CSI bases its attack
8 on Armstrong on nothing other than its mad determination to
9 destroy him, and that its allegations concerning him in the
10 "Squirrels" publication are false. CSI must therefore produce the
11 requested documents.

12 REQUEST TO PRODUCE DOCUMENTS NO. 43:

13 All documents of any kind on which the Scientology
14 organization based any and all of its claims concerning defendant
15 contained in the affidavits of Kenneth Long and Sheila Chaleff or
16 any other documents filed in the case of Church of Scientology of
17 California v. Russell Miller & Penguin Books in London, England;

18 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 43:

19 Objection. The requested documents exceed the scope of
20 permissible discovery because they are not relevant to any issue
21 in this case, and because their production will not lead to the
22 discovery of admissible evidence. The request relates solely to
23 issues which Armstrong attempted to raise in his cross-complaint,
24 which was dismissed by the Court on March 25, 1994, pursuant to
25 CSI's demurrer. Moreover, the request is not interposed for any
26 legitimate purpose, but solely to harass CSI.

27 Notwithstanding these objections, and to the extent that it
28 understands this request, CSI responds that it will produce

1 documents responsive to this request that are within its
2 possession, custody and control.

3 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

4 The requested documents are relevant to the issues in this
5 case or will lead to the discovery of admissible evidence. The
6 request is interposed for a legitimate purpose and is not in any
7 way harassing of CSI. The request is clear, unambiguous,
8 comprehensible and intelligible. The request does not relate
9 solely to Armstrong's cross-complaint. It relates to Armstrong's
10 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
11 (Allegation Common to All Affirmative Defenses), 49 (Association),
12 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57 (Duress and
13 Undue Influence), 67 (Offset), 70 (Justification - Defense of
14 Another, Interests of Third Persons, and the Public), 77 (Equal
15 Protection), 78 (Right to Counsel) in Armstrong's Answer.
16 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
17 CSI and its related entities filed affidavits attacking Armstrong
18 in the Miller case in 1987 following the 1986 "settlement." CSI
19 through its lawyer, Earle C. Cooley, threatened Armstrong with
20 being sued if he even talked to opposing counsel in the case where
21 he was being attacked. Flynn acted as Scientology's agent in
22 passing on Cooley's threat. The requested documents relate to a
23 matter which is relevant to everything Armstrong did post
24 "settlement" and to all the lawsuits CSI has brought against him.
25 CSI has produced some, but not all, of the affidavits that
26 were filed in the Miller case, but none of the documents on which
27 the allegations made in the affidavits are based. This is a
28 partial list of missing documents which are referred to in the

1 affidavits but not produced:

2 A. 7/21/38 letter from Hubbard to Polly;

3 B. Hubbard's boy scout diary;

4 C. Hubbard diaries 1927 - 1929;

5 D. Affidavit of Timothy Bowles re Armstrong I trial
6 exhibits;

7 E. 12/20/84 TRO in Roes 1 - 100 v. Superior Court, LASC No.
8 C 527556;

9 F. 8/24/82 TRO in Armstrong I;

10 G. 3 letters from Hubbard to Helen O'Brien in 1953;

11 H. "the materials surrendered pursuant to court order to
12 the Clerk" in Armstrong I;

13 I. "the 200 exhibits ... held by the trial judge" in
14 Armstrong I;

15 J. Hubbard's military records viewed by a "UPI reporter;"

16 K. the Armstrong I trial exhibits;

17 L. "those documents which were not introduced into evidence
18 (in Armstrong I) and which remained in the possession of the Clerk
19 of the Court;

20 M. Armstrong 12/12/81 "resignation letter;"

21 N. the Armstrong I "sealing orders;"

22 O. documents delivered by Armstrong to CSI at the time of
23 the 1986 "settlement."

24 Also omitted are any documents on which Scientology agent
25 Kenneth Long based his charge that "Armstrong has been an admitted
26 agent provocateur of the U.S. Federal Government," or the claim
27 that the organization had "spent thousands of man hours and
28 millions of dollars since 1982 in order to uphold the duty it owed

1 Mr. Hubbard as the bailee for his materials when they were taken
2 by Mr. Armstrong."

3 CSI must produce the requested documents.

4 REQUEST TO PRODUCE DOCUMENTS NO. 44:

5 All correspondence, orders or documents of any kind which
6 mention, concern or relate in any way to Gerald Armstrong which
7 were given or delivered at any time to any private investigator,
8 intelligence agent or any other agent or person employed or not by
9 CSI or any of the entities or individuals listed or referred to in
10 paragraph 1 of the "Mutual Release of All Claims and Settlement
11 Agreement" of December, 1986, a copy of which is attached to the
12 Complaint in this action as Exhibit A;

13 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 44:

14 Objection. The request exceeds the scope of permissible
15 discovery because it is not relevant to any issue in this case,
16 and because it will not lead to the discovery of admissible
17 evidence. The request relates solely to issues which Armstrong
18 attempted to raise in his cross-complaint, which was dismissed by
19 the Court on March 25, 1994, pursuant to CSI's demurrer.
20 Moreover, the request is vague, ambiguous, incomprehensible and
21 unintelligible. Moreover, the request is not interposed for any
22 legitimate purpose, but solely to harass CSI. Further, the
23 request seeks documents which are privileged pursuant to the
24 attorney-client privilege and the work product doctrine.

25 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

26 The requested documents are relevant to the issues in this
27 case or will lead to the discovery of admissible evidence. The
28 request is interposed for a legitimate purpose and is not in any

1 way harassing of CSI. The request is clear, unambiguous,
2 comprehensible and intelligible. The request does not relate
3 solely to Armstrong's cross-complaint. It relates to Armstrong's
4 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
5 (Allegation Common to All Affirmative Defenses) 52 (Unclean
6 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
7 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
8 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
9 - Defense of Another, Interests of Third Persons, and the Public),
10 73 (Void as Against Public Policy), 77 (Equal Protection), 82
11 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
12 has filed a Second Amended Cross-Complaint. CSI and its related
13 entities have carried out years of intelligence operations against
14 Armstrong, and run numerous agents, including hired PIs and its
15 own staff, to surveil, intimidate, harass, entrap, frame and ruin
16 him. CSI and its related entities briefs these agents and
17 provides them with background documents and orders. These are
18 relevant and must be produced. Any documents in response to this
19 request for which CSI claims a privilege should be described and
20 listed.

21 REQUEST TO PRODUCE DOCUMENTS NO. 45:

22 All correspondence, reports or documents of any kind which
23 mention, concern or relate in any way to Gerald Armstrong which
24 were received at any time from any private investigator,
25 intelligence agent or any other agent or person employed or not by
26 CSI or any of the entities or individuals listed or referred to in
27 paragraph 1 of the "Mutual Release of All Claims and Settlement
28 Agreement" of December, 1986, a copy of which is attached to the

1 Complaint in this action as Exhibit A;

2 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 45:

3 Objection. The request exceeds the scope of permissible
4 discovery because it is not relevant to any issue in this case,
5 and because it will not lead to the discovery of admissible
6 evidence. The request relates solely to issues which Armstrong
7 attempted to raise in his cross-complaint, which was dismissed by
8 the Court on March 25, 1994, pursuant to CSI's demurrer.
9 Moreover, the request is vague, ambiguous, incomprehensible and
10 unintelligible. Moreover, the request is not interposed for any
11 legitimate purpose, but solely to harass CSI.

12 Notwithstanding these objections, and to the extent that it
13 understands this request, CSI responds that it will produce
14 documents responsive to this request that are within its
15 possession, custody and control.

16 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

17 The requested documents are relevant to the issues in this
18 case or will lead to the discovery of admissible evidence. The
19 request is interposed for a legitimate purpose and is not in any
20 way harassing of CSI. The request is clear, unambiguous,
21 comprehensible and intelligible. The request does not relate
22 solely to Armstrong's cross-complaint. It relates to Armstrong's
23 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
24 (Allegation Common to All Affirmative Defenses) 52 (Unclean
25 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
26 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
27 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
28 - Defense of Another, Interests of Third Persons, and the Public),

1 73 (Void as Against Public Policy), 77 (Equal Protection), 82
2 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
3 has filed a Second Amended Cross-Complaint.

4 CSI has produced 3 declarations in response to this request.
5 The produced documents concern surveillance by PIs hired by
6 Scientology to watch and videotape persons coming and going from
7 Ford Greene's office. Only 1 of the 3 declarations concerns
8 Armstrong. This one refers to a videotape which CSI has not
9 produced. CSI and its related entities have run PI and
10 intelligence surveillance and covert operations against Armstrong
11 since 1982. (See, e.g., list in 15 above). CSI must produce all
12 the reports and items received by its and its related entities at
13 any time from any of the organization's PIs or other agents.

14 REQUEST TO PRODUCE DOCUMENTS NO. 46:

15 Any and all photographs of Gerald Armstrong;

16 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 46:

17 Objection. The requested documents exceed the scope of
18 permissible discovery because they are not relevant to any issue
19 in this case, and because their production will not lead to the
20 discovery of admissible evidence. Further, the request is
21 overbroad, burdensome and oppressive. Moreover, the request is
22 not interposed for any legitimate purpose, but solely to harass
23 CSI.

24 Notwithstanding these objections, and to the extent that it
25 understands this request, CSI responds that it will produce
26 documents responsive to this request that are within its
27 possession, custody and control.
28

1 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

2 The requested photographs are relevant to the issues in this
3 case or will lead to the discovery of admissible evidence. The
4 request is interposed for a legitimate purpose and is not in any
5 way harassing, overbroad, burdensome or oppressive. CSI has
6 produced some photocopies of some of the photos it possesses of
7 Armstrong. Armstrong believes that this is a mere fraction of the
8 photographs the organization actually possesses and he requests
9 that the rest be produced. This includes, but is not limited to,
10 photographs on which it based its charge that Armstrong was
11 impersonating an FBI officer in Boston in 1985, photographs taken
12 by Scientology operatives of Armstrong with reporter William
13 Horne, photographs taken by Ingram and associates, photographs of
14 Armstrong's wedding on board Hubbard's yacht "Apollo."

15 REQUEST TO PRODUCE DOCUMENTS NO. 47:

16 Any and all videotapes and/or audiotapes, in their entirety
17 and all edited or altered versions thereof, which mention, contain
18 the likeness of, or relate in any way to Gerald Armstrong;

19 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 47:

20 Objection. The requested documents exceed the scope of
21 permissible discovery because they are not relevant to any issue
22 in this case, and because their production will not lead to the
23 discovery of admissible evidence. Further, the request is
24 overbroad, burdensome and oppressive. Moreover, the request is
25 not interposed for any legitimate purpose, but solely to harass
26 CSI. Further, the request seeks documents which are privileged
27 pursuant to the attorney-client privilege and the work product
28 doctrine. CSI has already produced documents responsive to this

1 request to Armstrong in other litigation.

2 Notwithstanding these objections, and to the extent that it
3 understands this request, CSI responds that it will produce non-
4 privileged documents responsive to this request that are within
5 its possession, custody and control, if any, which it has not
6 already produced to Armstrong.

7 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

8 The requested videotapes are relevant to the issues in this
9 case or will lead to the discovery of admissible evidence. The
10 request is interposed for a legitimate purpose and is not in any
11 way harassing, overbroad, burdensome or oppressive. CSI has
12 produced some videotapes it possesses of Armstrong. Armstrong
13 believes that this is a mere fraction of the videotapes the
14 organization actually possesses and he requests that the rest be
15 produced. This includes, but is not limited to, all surveillance
16 tapes made at any time, and all edited versions thereof. If there
17 are specific videotapes CSI claims are privileged, it should
18 describe and list such tapes.

19 REQUEST TO PRODUCE DOCUMENTS NO. 48:

20 All documents on which CSI or any of the entities or
21 individuals listed or referred to in paragraph 1 of the "Mutual
22 Release of All Claims and Settlement Agreement" of December, 1986,
23 a copy of which is attached to the Complaint in this action as
24 Exhibit A, based the statements in the document described as the
25 "Bent Corydon dead agent pack," which mention, concern or relate
26 in any way to defendant Gerald Armstrong;

27 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 48:

28 Objection. The requested documents exceed the scope of

1 permissible discovery because they are not relevant to any issue
2 in this case, and because their production will not lead to the
3 discovery of admissible evidence. The request relates solely to
4 issues which Armstrong attempted to raise in his cross-complaint,
5 which was dismissed by the Court on March 25, 1994, pursuant to
6 CSI's demurrer. Moreover, the request is vague, ambiguous,
7 incomprehensible and unintelligible. Further, the request is
8 overbroad, burdensome and oppressive. Moreover, the request is
9 not interposed for any legitimate purpose, but solely to harass
10 CSI.

11 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

12 The requested documents are relevant to the issues in this
13 case or will lead to the discovery of admissible evidence. The
14 request is interposed for a legitimate purpose and is not in any
15 way harassing of CSI. The request is clear, unambiguous,
16 comprehensible and intelligible. It is narrow, no burden to CSI
17 and not at all oppressive. The request does not relate solely to
18 Armstrong's cross-complaint. It relates to Armstrong's defenses
19 in the action; see, e.g., paragraph 1, 2, 3, 32, 46 (Allegation
20 Common to All Affirmative Defenses), 49 (Association), 52 (Unclean
21 Hands), 54 (Estoppel), 55 (Waiver) 57 (Duress and Undue
22 Influence), 67 (Offset), 70 (Justification - Defense of Another,
23 Interests of Third Persons, and the Public), 77 (Equal
24 Protection), 78 (Right to Counsel) in Armstrong's Answer.
25 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
26 CSI and its related entities published this "dead agent pack" in
27 1987 following the 1986 "settlement." It contained false
28 statements about Armstrong and included a description of his

1 experiences in Scientology and in his litigation with the
2 organization. This attack on Armstrong was a factor in all the
3 actions he took after the "settlement," and it is thus relevant to
4 all CSI's claims in this action. Armstrong contends that its
5 charges in its dead agent pack are false and unfounded. CSI
6 should produce the requested documents.

7 REQUEST TO PRODUCE DOCUMENTS NO. 49:

8 All documents which state or show the relationship of David
9 Miscavige to CSI;

10 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 49:

11 Objection. The requested documents exceed the scope of
12 permissible discovery because they are not relevant to any issue
13 in this case, and because their production will not lead to the
14 discovery of admissible evidence. The request relates solely to
15 issues which Armstrong attempted to raise in his cross-complaint,
16 which was dismissed by the Court on March 25, 1994, pursuant to
17 CSI's demurrer. Moreover, the request is vague, ambiguous,
18 incomprehensible and unintelligible. Further, the request is
19 overbroad, burdensome and oppressive. Moreover, the request is
20 not interposed for any legitimate purpose, but solely to harass
21 CSI. Further, the request seeks documents which are privileged
22 pursuant to the attorney-client privilege and the work product
23 doctrine.

24 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

25 The requested documents are relevant to the issues in this
26 case or will lead to the discovery of admissible evidence. The
27 request is interposed for a legitimate purpose and is not in any
28 way harassing, burdensome or oppressive. The request is clear,

1 unambiguous, comprehensible and intelligible. The request does
2 not relate solely to Armstrong's cross-complaint. It relates to
3 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
4 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
5 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
6 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
7 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
8 Defense of Another, Interests of Third Persons, and the Public),
9 73 (Void as Against Public Policy), 77 (Equal Protection), 82
10 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
11 has filed a Second Amended Cross-Complaint. Miscavige is CSI's
12 managing agent and runs every aspect of the Scientology
13 organization. He is a cross-defendant herein. He has ordered,
14 approved and directed all the operations the organization has run
15 against Armstrong since 1982. There can be no legitimate
16 attorney-client or work product privilege to hide his relationship
17 to CSI. CSI must produce the requested documents.

18 REQUEST TO PRODUCE DOCUMENTS NO. 50:

19 All documents which state or show the relationship of
20 Religious Technology Center to CSI;

21 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 50:

22 Objection. The requested documents exceed the scope of
23 permissible discovery because they are not relevant to any issue
24 in this case, and because their production will not lead to the
25 discovery of admissible evidence. The request relates solely to
26 issues which Armstrong attempted to raise in his cross-complaint,
27 which was dismissed by the Court on March 25, 1994, pursuant to
28 CSI's demurrer. Moreover, the request is vague, ambiguous,

1 incomprehensible and unintelligible. Further, the request is
2 overbroad, burdensome and oppressive. Moreover, the request is
3 not interposed for any legitimate purpose, but solely to harass
4 CSI. Further, the request seeks documents which are privileged
5 pursuant to the attorney-client privilege and the work product
6 doctrine.

7 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

8 The requested documents are relevant to the issues in this
9 case or will lead to the discovery of admissible evidence. The
10 request is interposed for a legitimate purpose and is not in any
11 way harassing, burdensome or oppressive. The request is clear,
12 unambiguous, comprehensible and intelligible. The request does
13 not relate solely to Armstrong's cross-complaint. It relates to
14 Armstrong's defenses in the action; see, e.g., paragraph 1, 2, 3,
15 32, 46 (Allegation Common to All Affirmative Defenses) 52 (Unclean
16 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
17 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
18 Unreasonable Contract), 64 (Unconscionability), 70 (Justification -
19 Defense of Another, Interests of Third Persons, and the Public),
20 73 (Void as Against Public Policy), 77 (Equal Protection), 82
21 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
22 has filed a Second Amended Cross-Complaint. Miscavige runs every
23 aspect of the Scientology organization through RTC, a Scientology
24 "corporation" set up for that very purpose. It is as the head of
25 RTC that Miscavige oversees and controls all CSI's litigations,
26 orders attacks by CSI on Armstrong, and approves every lie told by
27 its members and attorneys. There can be no legitimate attorney-
28 client or work product privilege to hide RTC's relationship to

1 CSI. CSI must produce the requested documents. If there are
2 specific documents for which CSI claims a legitimate privilege it
3 must describe and list them.

4 REQUEST TO PRODUCE DOCUMENTS NO. 51:

5 All documents on which CSI bases its assertion made by its
6 agent Eugene M. Ingram, that Gerald Armstrong has AIDS;

7 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 51:

8 Objection. The requested documents exceed the scope of
9 permissible discovery because they are not relevant to any issue
10 in this case, and because their production will not lead to the
11 discovery of admissible evidence. The request relates solely to
12 issues which Armstrong attempted to raise in his cross-complaint,
13 which was dismissed by the Court on March 25, 1994, pursuant to
14 CSI's demurrer. Moreover, the request is vague, ambiguous,
15 incomprehensible and unintelligible. Further, the request seeks
16 documents concerning events which never occurred, and so is
17 incapable of response. Moreover, the request is not interposed
18 for any legitimate purpose, but solely to harass CSI.

19 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

20 The requested documents are relevant to the issues in this
21 case or will lead to the discovery of admissible evidence. The
22 request is interposed for a legitimate purpose and is not in any
23 way harassing of CSI. The request is clear, unambiguous,
24 comprehensible and intelligible. The request does not relate
25 solely to Armstrong's cross-complaint. It relates to Armstrong's
26 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
27 (Allegation Common to All Affirmative Defenses) 52 (Unclean
28 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and

1 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
2 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
3 - Defense of Another, Interests of Third Persons, and the Public),
4 73 (Void as Against Public Policy), 77 (Equal Protection), 82
5 (Conflict of Interest) in Armstrong's Answer. Ingram is CSI's
6 agent. He made the charge that Armstrong has AIDS in front of
7 other CSI agents and others. CSI cannot simply deny that the
8 event ever occurred. If it has no documents to support Ingram's
9 slander it should so state.

10 REQUEST TO PRODUCE DOCUMENTS NO. 52:

11 All documents on which CSI bases its assertion that Gerald
12 Armstrong is an SP;

13 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 52:

14 Objection. The requested documents exceed the scope of
15 permissible discovery because they are not relevant to any issue
16 in this case, and because their production will not lead to the
17 discovery of admissible evidence. The request relates solely to
18 issues which Armstrong attempted to raise in his cross-complaint,
19 which was dismissed by the Court on March 25, 1994, pursuant to
20 CSI's demurrer. Further, the request seeks documents in violation
21 of the right of plaintiff and its parishioners to freely practice
22 their religion pursuant to the First Amendment to the United
23 States Constitution. Further, the request is overbroad,
24 burdensome and oppressive. Moreover, the request seeks documents
25 which are part of the public record, as well as documents created
26 by defendant Armstrong, and are equally available to Armstrong.
27 Moreover, the request is not interposed for any legitimate
28 purpose, but solely to harass CSI.

1 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

2 The requested documents are relevant to the issues in this
3 case or will lead to the discovery of admissible evidence. The
4 request is interposed for a legitimate purpose and is not in any
5 way harassing, overbroad, burdensome or oppressive. The request
6 does not relate solely to Armstrong's cross-complaint. It relates
7 to Armstrong's defenses in the action; see, e.g., paragraph 1, 2,
8 3, 32, 46 (Allegation Common to All Affirmative Defenses), 49
9 (Association), 52 (Unclean Hands), 54 (Estoppel), 55 (Waiver) 57
10 (Duress and Undue Influence), 67 (Offset), 70 (Justification -
11 Defense of Another, Interests of Third Persons, and the Public),
12 77 (Equal Protection), 78 (Right to Counsel) in Armstrong's
13 Answer. Moreover, Armstrong has filed a Second Amended Cross-
14 Complaint. Scientology's policies on how it views and treats what
15 it calls "suppressive persons" or "SP's" are central to its years
16 of fair game toward Armstrong and his attorneys. Pursuant to the
17 fair game doctrine, judicially recognized and condemned, someone
18 declared a "suppressive person" may be tricked, sued, cheated,
19 lied to and destroyed. To carry out this attack up to and
20 including destruction, CSI and its related entities use
21 sophisticated intelligence methods Hubbard patterned after Nazi
22 spy chief Reinhard Gehlen, public relations "tech" Hubbard called
23 "black PR," and bullying, which includes using the legal process
24 to harass and ruin. The importance of the policies and orders
25 relating to SP's is that they must be followed to the letter by
26 all Scientology personnel, or the non-complying personnel
27 themselves will become labelled "suppressives" and themselves
28 become fair game. These policies and orders also set up a state

1 of mind in Scientologists which makes it laudable to trick, cheat,
2 lie to, bully and destroy labelled "suppressives." Judge
3 Breckenridge found the Scientology organization "paranoid and
4 schizophrenic." These organizational psychological
5 characteristics flow from the antisocial, criminal and dangerous
6 policies concerning SP's. This is the danger that Armstrong has
7 faced since he left Scientology. It is the danger that caused
8 Michael Flynn to betray his responsibilities as an officer of the
9 court in order to escape. And it is the danger which has brought
10 Armstrong to defend himself and others after the 1986
11 "settlement." Thus CSI's and its related entities policies and
12 orders concerning "SP's" are inescapably part of this litigation.
13 Armstrong asks here for what documents CSI has which show that
14 Armstrong is, indeed a "suppressive person." Armstrong contends
15 that even by Scientology's own policies he is not a "SP," but has
16 been improperly and destructively so labelled. He contends that
17 either "suppressive persons" as they are understood and depicted
18 in Scientology's policies do not exist, or that its own leaders
19 are "SP's" and therefore Armstrong is justified by Scientology's
20 own policies in doing whatever he can to oppose these SP's. CSI
21 must produce these documents. The production of the requested
22 documents will not prevent CSI or its "parishioners" from
23 practicing their "religion." Since all the requested documents
24 are referring to Armstrong, no one else's privacy rights are
25 involved.

26 REQUEST TO PRODUCE DOCUMENTS NO. 53:

27 All documents on which Scientology, CSI or any of the
28 entities or individuals listed or referred to in paragraph 1 of

1 the "Mutual Release of All Claims and Settlement Agreement" of
2 December, 1986, a copy of which is attached to the Complaint in
3 this action as Exhibit A, base their assertion in the November
4 1989 declaration of Lawrence Heller that "one of the key
5 ingredients to completing these (December 1986) settlements,
6 insisted upon by all parties involved, was strict confidentiality
7 respecting: (1) the Scientology parishioner or staff member's
8 experiences within the Church of Scientology; (2) any knowledge
9 possessed by the Scientology entities concerning those staff
10 members or parishioners; and (3) the terms and conditions of the
11 settlements themselves;

12 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 53:

13 Objection. The requested documents exceed the scope of
14 permissible discovery because they are not relevant to any issue
15 in this case, and because their production will not lead to the
16 discovery of admissible evidence. Moreover, the request relates
17 solely to issues which Armstrong attempted to raise in his cross-
18 complaint, which was dismissed by the Court on March 25, 1994,
19 pursuant to CSI's demurrer. Further, the request is overbroad,
20 burdensome and oppressive. Moreover, the request is vague,
21 ambiguous, incomprehensible and unintelligible. Further, the
22 request seeks documents concerning events which never occurred,
23 and so is incapable of response. Mr. Heller's declaration does
24 not make the assertion supposedly quoted by defendant.

25 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

26 The requested documents are relevant to the issues in this
27 case or will lead to the discovery of admissible evidence. The
28 request is interposed for a legitimate purpose and is not in any

1 way harassing, burdensome or oppressive. The request is narrow,
2 clear, unambiguous, comprehensible and intelligible. The request
3 does not relate solely to Armstrong's cross-complaint. It relates
4 to Armstrong's defenses in the action; see, e.g., paragraph 1, 2,
5 3, 32, 46 (Allegation Common to All Affirmative Defenses) 52
6 (Unclean Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56
7 (Fraud and Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
8 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
9 - Defense of Another, Interests of Third Persons, and the Public),
10 73 (Void as Against Public Policy), 77 (Equal Protection), 82
11 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
12 has filed a Second Amended Cross-Complaint. Heller's declaration
13 most certainly does state what Armstrong has stated in his request
14 for production. CSI's response is a lie. It must produce the
15 requested documents, or acknowledge Heller's lie.

16 REQUEST TO PRODUCE DOCUMENTS NO. 54:

17 All documents on which Scientology, CSI or any of the
18 entities or individuals listed or referred to in paragraph 1 of
19 the "Mutual Release of All Claims and Settlement Agreement" of
20 December, 1986, a copy of which is attached to the Complaint in
21 this action as Exhibit A, base their assertion that they did not
22 violate said agreement when they published statements concerning
23 Gerald Armstrong in the Bent Corydon dead agent pack in 1987;

24 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 54:

25 Objection. The requested documents exceed the scope of
26 permissible discovery because they are not relevant to any issue
27 in this case, and because their production will not lead to the
28 discovery of admissible evidence. The request relates solely to

1 issues which Armstrong attempted to raise in his cross-complaint,
2 which was dismissed by the Court on March 25, 1994, pursuant to
3 CSI's demurrer. Moreover, the request is vague, ambiguous,
4 incomprehensible and unintelligible. Moreover, the request is not
5 interposed for any legitimate purpose, but solely to harass CSI.
6 Moreover, the request seeks documents which are part of the public
7 record as well as documents created by defendant Armstrong, and
8 are equally available to Armstrong.

9 Notwithstanding these objections, and to the extent that it
10 understands this request, CSI responds that it will produce
11 documents responsive to this request that are within its
12 possession, custody and control.

13 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

14 The requested documents are relevant to the issues in this
15 case or will lead to the discovery of admissible evidence. The
16 request is interposed for a legitimate purpose and is not in any
17 way harassing of CSI. The request is clear, unambiguous,
18 comprehensible and intelligible. The request does not relate
19 solely to Armstrong's cross-complaint. It relates to Armstrong's
20 defenses in the action; see, e.g., paragraph 1, 2, 3, 32, 46
21 (Allegation Common to All Affirmative Defenses) 52 (Unclean
22 Hands), 53 (Illegality), 54 (Estoppel), 55 (Waiver) 56 (Fraud and
23 Deceit), 57 (Duress and Undue Influence) 60 (Unfair and
24 Unreasonable Contract), 64 (Unconscionability), 70 (Justification
25 - Defense of Another, Interests of Third Persons, and the Public),
26 73 (Void as Against Public Policy), 77 (Equal Protection), 82
27 (Conflict of Interest) in Armstrong's Answer. Moreover, Armstrong
28 has filed a Second Amended Cross-Complaint. The requested

1 documents have not been created by Armstrong and are not available
2 to him.

3 CSI produced in response to this request a copy of the
4 subject "settlement agreement." This is merely "cute." CSI
5 violated with the Corydon DA pack paragraphs 5 (release of all
6 claims), 7I (slate is wiped clean) and 18E (refrain from acts
7 inconsistent with agreement.) CSI's violations of these
8 provisions were a factor in Armstrong's actions after the
9 "settlement." CSI is asked here to support its claim that its act
10 with the Corydon DA pack is not a violation. It must produce the
11 requested documents.

12 REQUEST TO PRODUCE DOCUMENTS NO. 55:

13 All documents on which Scientology, CSI or any of the
14 entities or individuals listed or referred to in paragraph 1 of
15 the "Mutual Release of All Claims and Settlement Agreement" of
16 December, 1986, a copy of which is attached to the Complaint in
17 this action as Exhibit A, base their assertion that they do not
18 cull preclear folders, do not provide the supposedly confidential
19 statements of individuals undergoing auditing to organization
20 executives, personnel in their legal or intelligence branches and
21 hired private investigators, and do not use such supposedly
22 confidential statements against said individuals undergoing
23 auditing for any purpose whatsoever and/or in any circumstances
24 whatsoever.

25 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 55:

26 Objection. The requested documents exceed the scope of
27 permissible discovery because they are not relevant to any issue
28 in this case, and because their production will not lead to the

1 discovery of admissible evidence. The request relates solely to
2 issues which Armstrong attempted to raise in his cross-complaint,
3 which was dismissed by the Court on March 25, 1994, pursuant to
4 CSI's demurrer. Moreover, the request is vague, ambiguous,
5 incomprehensible and unintelligible. Further, the request is
6 overbroad, burdensome and oppressive. Moreover, the request is
7 not interposed for any legitimate purpose, but solely to harass
8 CSI.

9 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

10 The requested documents are relevant to the issues in this
11 case or will lead to the discovery of admissible evidence. The
12 request is interposed for a legitimate purpose and is not in any
13 way harassing, burdensome or oppressive. The request is clear,
14 unambiguous, comprehensible and intelligible. The request does
15 not relate solely to Armstrong's cross-complaint. It relates to
16 Armstrong's defenses in the action; see, e.g., paragraphs
17 paragraph 1, 2, 3, 32, 46 (Allegation Common to All Affirmative
18 Defenses) 52 (Unclean Hands), 53 (Illegality), 54 (Estoppel), 55
19 (Waiver) 56 (Fraud and Deceit), 57 (Duress and Undue Influence) 60
20 (Unfair and Unreasonable Contract), 64 (Unconscionability), 70
21 (Justification - Defense of Another, Interests of Third Persons,
22 and the Public), 73 (Void as Against Public Policy), 77 (Equal
23 Protection), 82 (Conflict of Interest) in Armstrong's Answer.
24 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
25 CSI and its related entities culls preclear folders and uses the
26 culled materials however it wants to hold, harm or attack the
27 persons who have in the past divulged in the supposedly
28 confidential setting of auditing the incidents from their past

1 that are used to hold, harm or attack them. CSI, meanwhile,
2 claims that information divulged in auditing is confidential,
3 indeed sacrosanct. CSI and its related entities culled
4 Armstrong's preclear folders used the information culled against
5 him. It continues to use this information to this day. What
6 Armstrong is requesting here are Scientology's statements of
7 confidentiality and the proof of that claim. This issue has been
8 central to all of Scientology's litigations with Armstrong, and is
9 relevant to the uneven legal playing field it has achieved in this
10 action, because all of its members are controlled by the fact that
11 the organization has their innermost thoughts, which will be used
12 against them if they do not participate as ordered in the assault
13 on Armstrong. CSI must produce the requested documents.

14 REQUEST TO PRODUCE DOCUMENTS NO. 56:

15 All documents on which CSI bases its assertion that Gerald
16 Armstrong fraudulently conveyed anything to anyone at any time.

17 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 56:

18 Objection. This request is overbroad, burdensome and
19 oppressive. Moreover, the request is vague, ambiguous,
20 incomprehensible and unintelligible. Moreover, the request seeks
21 documents which are part of the public record as well as documents
22 created by defendant Armstrong, and are equally available to
23 Armstrong. Moreover, the requested documents exceed the scope of
24 permissible discovery to the extent that they seek documents that
25 are not relevant to any issue in this case, and the production of
26 which will not lead to the discovery of admissible evidence.

27 Further, the request is premature, unreasonably burdensome and
28 unreasonably attempts to restrict the facts on which CSI may rely

1 at trial insofar as CSI has not completed its investigation of the
2 facts relating to this action, has not completed its discovery in
3 this action and has not completed its preparation for trial.

4 Consequently, the following response is given without prejudice to
5 CSI's right to subsequently update this response and to produce,
6 at time of trial, subsequently discovered evidence or documents
7 relating to the proof of subsequently discovered material facts.

8 Notwithstanding these objections, and to the extent that it
9 understands this request, CSI responds that it will produce
10 relevant documents responsive to this request that are within its
11 possession, custody and control.

12 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

13 The requested documents are relevant to the issues in this
14 case or will lead to the discovery of admissible evidence. The
15 request is interposed for a legitimate purpose and is not in any
16 way harassing, burdensome or oppressive. The request is clear,
17 unambiguous, comprehensible and intelligible. It does not seek to
18 restrict the facts on which CSI may rely at trial, but seeks to
19 know what if any facts CSI now has.

20 CSI has produced documents produced to it by Armstrong or
21 Michael Walton in this action and the transcripts of the
22 depositions of Walton in Armstrong II and IV, and Armstrong in
23 Armstrong II. If those are all the documents CSI possesses in
24 response to this request, this production is acceptable.

25 REQUEST TO PRODUCE DOCUMENTS NO. 57:

26 All documents on which CSI bases its assertion that Gerald
27 Armstrong transferred anything to anyone at any time with the
28 intention to hinder, delay or defraud plaintiff in the collection

1 of its damages.

2 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 57:

3 Objection. This request is overbroad, burdensome and
4 oppressive. Moreover, the request is vague, ambiguous,
5 incomprehensible and unintelligible. Moreover, the request seeks
6 documents which are part of the public record as well as documents
7 created by defendant Armstrong, and are equally available to
8 Armstrong. Moreover, the requested documents exceed the scope of
9 permissible discovery to the extent that they seek documents that
10 are not relevant to any issue in this case, and the production of
11 which will not lead to the discovery of admissible evidence.
12 Further, the request is premature, unreasonably burdensome and
13 unreasonably attempts to restrict the facts on which CSI may rely
14 at trial insofar as CSI has not completed its investigation of the
15 facts relating to this action, has not completed its discovery in
16 this action and has not completed its preparation for trial.
17 Consequently, the following response is given without prejudice to
18 CSI's right to subsequently update this response and to produce,
19 at time of trial, subsequently discovered evidence or documents
20 relating to the proof of subsequently discovered material facts.

21 Notwithstanding these objections, and to the extent that it
22 understands this request, CSI responds that it will produce
23 relevant documents responsive to this request that are within its
24 possession, custody and control.

25 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

26 The requested documents are relevant to the issues in this
27 case or will lead to the discovery of admissible evidence. The
28 request is interposed for a legitimate purpose and is not in any

1 way harassing, burdensome or oppressive. The request is clear,
2 unambiguous, comprehensible and intelligible. It does not seek to
3 restrict the facts on which CSI may rely at trial, but seeks to
4 know what if any facts CSI now has.

5 Despite its promise to produce documents responsive to this
6 request, CSI has produced none. It must do so.

7 REQUEST TO PRODUCE DOCUMENTS NO. 58:

8 All documents on which CSI bases its assertion that Gerald
9 Armstrong conspired with Michael Walton to do anything at any
10 time.

11 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 58:

12 Objection. This request is overbroad, burdensome and
13 oppressive. Moreover, the request is vague, ambiguous,
14 incomprehensible and unintelligible. Moreover, the request seeks
15 documents which are part of the public record as well as documents
16 created by defendant Armstrong, and are equally available to
17 Armstrong. Moreover, the requested documents exceed the scope of
18 permissible discovery to the extent that they seek documents that
19 are not relevant to any issue in this case, and the production of
20 which will not lead to the discovery of admissible evidence.
21 Further, the request is premature, unreasonably burdensome and
22 unreasonably attempts to restrict the facts on which CSI may rely
23 at trial insofar as CSI has not completed its investigation of the
24 facts relating to this action, has not completed its discovery in
25 this action and has not completed its preparation for trial.
26 Consequently, the following response is given without prejudice to
27 CSI's right to subsequently update this response and to produce,
28 at time of trial, subsequently discovered evidence or documents

1 relating to the proof of subsequently discovered material facts.

2 Notwithstanding these objections, and to the extent that it
3 understands this request, CSI responds that it will produce
4 relevant documents responsive to this request that are within its
5 possession, custody and control.

6 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

7 The requested documents are relevant to the issues in this
8 case or will lead to the discovery of admissible evidence. The
9 request is interposed for a legitimate purpose and is not in any
10 way harassing, burdensome or oppressive. The request is clear,
11 unambiguous, comprehensible and intelligible. It does not seek to
12 restrict the facts on which CSI may rely at trial, but seeks to
13 know what if any facts CSI now has.

14 Despite its promise to produce documents responsive to this
15 request, CSI has produced none. It must do so.

16 REQUEST TO PRODUCE DOCUMENTS NO. 59:

17 All documents showing David Miscavige's control of
18 Scientology, CSI, any of the entities or individuals listed or
19 referred to in paragraph 1 of the "Mutual Release of All Claims
20 and Settlement Agreement" of December, 1986, a copy of which is
21 attached to the Complaint in this action as Exhibit A, or any
22 Scientology or Sea Organization post, function, line, staff member
23 or individual.

24 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 59:

25 Objection. The requested documents exceed the scope of
26 permissible discovery because they are not relevant to any issue
27 in this case, and because their production will not lead to the
28 discovery of admissible evidence. The request relates solely to

1 issues which Armstrong attempted to raise in his cross-complaint,
2 which was dismissed by the Court on March 25, 1994, pursuant to
3 CSI's demurrer. Moreover, the request is vague, ambiguous,
4 incomprehensible and unintelligible. Further, the request is
5 overbroad, burdensome and oppressive. Moreover, the request is
6 not interposed for any legitimate purpose, but solely to harass
7 CSI.

8 Notwithstanding these objections, and to the extent that it
9 understands this request, CSI responds that it has no such
10 documents within its possession, custody and control.

11 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

12 The requested documents are relevant to the issues in this
13 case or will lead to the discovery of admissible evidence. The
14 request is interposed for a legitimate purpose and is not in any
15 way harassing, overbroad, burdensome or oppressive. The request
16 is clear, unambiguous, comprehensible and intelligible. The
17 request does not relate solely to Armstrong's cross-complaint. It
18 relates to Armstrong's defenses in the action; see, e.g.,
19 paragraph 1, 2, 3, 32, 46 (Allegation Common to All Affirmative
20 Defenses) 52 (Unclean Hands), 53 (Illegality), 54 (Estoppel), 55
21 (Waiver) 56 (Fraud and Deceit), 57 (Duress and Undue Influence) 60
22 (Unfair and Unreasonable Contract), 64 (Unconscionability), 70
23 (Justification - Defense of Another, Interests of Third Persons,
24 and the Public), 73 (Void as Against Public Policy), 77 (Equal
25 Protection), 82 (Conflict of Interest) in Armstrong's Answer.
26 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
27 Miscavige runs every aspect of the Scientology organization
28 through RTC, a Scientology "corporation" set up for that very

1 purpose. He orders attacks by CSI on Armstrong, runs the
2 litigations, and approves every lie told by its members and
3 attorneys in its litigations. CSI's claim that it possesses no
4 documents which show Miscavige's control of Scientology, CSI, RTC,
5 CST, ASI or any Scientology or Sea Organization post, function,
6 line, staff member or individual is simply a lie. CSI must
7 produce the requested documents.

8 REQUEST TO PRODUCE DOCUMENTS NO. 60:

9 All documents reflecting CSI's relationship at any time with
10 the Church of Scientology of California (CSC);

11 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 60:

12 Objection. The requested documents exceed the scope of
13 permissible discovery because they are not relevant to any issue
14 in this case, and because their production will not lead to the
15 discovery of admissible evidence. The request relates solely to
16 issues which Armstrong attempted to raise in his cross-complaint,
17 which was dismissed by the Court on March 25, 1994, pursuant to
18 CSI's demurrer. Moreover, the request is vague, ambiguous,
19 incomprehensible and unintelligible. Further, the request is
20 overbroad, burdensome and oppressive. Moreover, the request is
21 not interposed for any legitimate purpose, but solely to harass
22 CSI.

23 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

24 The requested documents are relevant to the issues in this
25 case or will lead to the discovery of admissible evidence. The
26 request is interposed for a legitimate purpose and is not in any
27 way harassing, overbroad, burdensome or oppressive. The request
28 is clear, unambiguous, comprehensible and intelligible. The

1 request does not relate solely to Armstrong's cross-complaint. It
2 relates to Armstrong's defenses in the action; see, e.g.,
3 paragraph 1, 2, 3, 32, 46 (Allegation Common to All Affirmative
4 Defenses) 52 (Unclean Hands), 53 (Illegality), 54 (Estoppel), 55
5 (Waiver) 56 (Fraud and Deceit), 57 (Duress and Undue Influence) 60
6 (Unfair and Unreasonable Contract), 64 (Unconscionability), 70
7 (Justification - Defense of Another, Interests of Third Persons,
8 and the Public), 73 (Void as Against Public Policy), 77 (Equal
9 Protection), 82 (Conflict of Interest) in Armstrong's Answer.
10 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
11 According to Scientology's public literature, CSI succeeded CSC as
12 the mother Scientology organization. CSC sued Armstrong in
13 Armstrong I, and claimed to be the bailee of Hubbard's archive
14 documents, which were central to the Armstrong I litigation and
15 this action. Moreover, CSC was for all intents and purposes all
16 of Scientology in 1981 and possessed and controlled all of the
17 organization's assets. CSC was subsequently stripped of its
18 assets and CSI "established." Notwithstanding that fact,
19 Scientology used CSC as the plaintiff to bring the Miller case in
20 which it attacked Armstrong in 1987. Armstrong contends that
21 Scientology's corporate identities are fictions and that the
22 organization is run as one entity by Miscavige. CSI must produce
23 the requested documents.

24 REQUEST TO PRODUCE DOCUMENTS NO. 61:

25 All documents reflecting CSI's relationship at any time with
26 the Office of Special Affairs (OSA), including all of OSA's units,
27 personnel, orders, command lines and functions;

28 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 61:

1 Objection. The requested documents exceed the scope of
2 permissible discovery because they are not relevant to any issue
3 in this case, and because their production will not lead to the
4 discovery of admissible evidence. The request relates solely to
5 issues which Armstrong attempted to raise in his cross-complaint,
6 which was dismissed by the Court on March 25, 1994, pursuant to
7 CSI's demurrer. Moreover, the request is vague, ambiguous,
8 incomprehensible and unintelligible. Further, the request is
9 overbroad, burdensome and oppressive. Moreover, the request is
10 not interposed for any legitimate purpose, but solely to harass
11 CSI.

12 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

13 The requested documents are relevant to the issues in this
14 case or will lead to the discovery of admissible evidence. The
15 request is interposed for a legitimate purpose and is not in any
16 way harassing, overbroad, burdensome or oppressive. The request
17 is clear, unambiguous, comprehensible and intelligible. The
18 request does not relate solely to Armstrong's cross-complaint. It
19 relates to Armstrong's defenses in the action; see, e.g.,
20 paragraph 1, 2, 3, 32, 46 (Allegation Common to All Affirmative
21 Defenses) 52 (Unclean Hands), 53 (Illegality), 54 (Estoppel), 55
22 (Waiver) 56 (Fraud and Deceit), 57 (Duress and Undue Influence) 60
23 (Unfair and Unreasonable Contract), 64 (Unconscionability), 70
24 (Justification - Defense of Another, Interests of Third Persons,
25 and the Public), 73 (Void as Against Public Policy), 77 (Equal
26 Protection), 82 (Conflict of Interest) in Armstrong's Answer.
27 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
28 The Office of Special Affairs (OSA) is the successor entity to the

1 Guardian's Office (GO), containing the identical functions of
2 intelligence, public relations and legal. OSA is "corporately"
3 within CSI. OSA has for years been involved and in present time
4 is involved in attacks on Armstrong. OSA is the arm of the
5 Scientology organization Miscavige uses to collect information on
6 perceived enemies and to attack them in the media, in court and in
7 covert operations. CSI's actual control of and relationship to,
8 the orders and policies setting up OSA, and the command channels
9 in and out of OSA are relevant to this action. CSI must produce
10 the requested documents.

11 All documents reflecting CSI's financial condition from 1981
12 to the present. Such documents shall include but not be limited
13 to financial statements, profit and loss statements, income and
14 expense statements, balance sheets and loan applications.

15 RESPONSE TO REQUEST TO PRODUCE DOCUMENTS NO. 62:

16 Objection. The requested documents exceed the scope of
17 permissible discovery because they are not relevant to any issue
18 in this case, and because their production will not lead to the
19 discovery of admissible evidence. The request relates solely to
20 issues which Armstrong attempted to raise in his cross-complaint,
21 which was dismissed by the Court on March 25, 1994, pursuant to
22 CSI's demurrer. Moreover, the request is vague, ambiguous,
23 incomprehensible and unintelligible. Further, the request is
24 overbroad, burdensome and oppressive. Moreover, the request is
25 not interposed for any legitimate purpose, but solely to harass
26 CSI. Moreover, the request calls for production of financial
27 records in violation of the privacy rights of plaintiff and others
28 pursuant to the California and United States constitutions, and

1 the California Civil Code.

2 REASONS WHY PRODUCTION OF DOCUMENTS IS NECESSARY

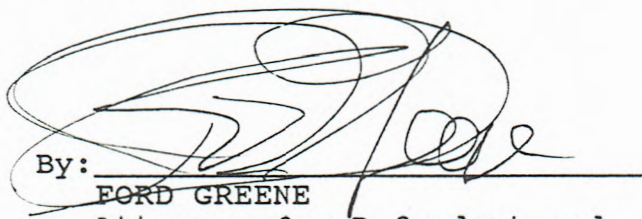
3 The requested documents are relevant to the issues in this
4 case or will lead to the discovery of admissible evidence. The
5 request is interposed for a legitimate purpose and is not in any
6 way harassing, overbroad, burdensome or oppressive. The request
7 is clear, unambiguous, comprehensible and intelligible. The
8 request does not relate solely to Armstrong's cross-complaint. It
9 relates to Armstrong's defenses in the action; see, e.g.,
10 paragraph 1, 2, 3, 32, 46 (Allegation Common to All Affirmative
11 Defenses) 52 (Unclean Hands), 53 (Illegality), 54 (Estoppel), 55
12 (Waiver) 56 (Fraud and Deceit), 57 (Duress and Undue Influence) 60
13 (Unfair and Unreasonable Contract), 64 (Unconscionability), 70
14 (Justification - Defense of Another, Interests of Third Persons,
15 and the Public), 73 (Void as Against Public Policy), 77 (Equal
16 Protection), 82 (Conflict of Interest) in Armstrong's Answer.
17 Moreover, Armstrong has filed a Second Amended Cross-Complaint.
18 CSI bases its claim of damages owed by Armstrong in Armstrong II,
19 on which it bases all of its claims in Armstrong IV, on the
20 liquidated damages clause in the subject "settlement agreement."
21 There must be a reasonable relationship between liquidated and
22 actual damages, which relationship requires proof. McCarthy v.
23 Tally, (1956) 45 C.2d 577, 586, 297 P.2 950. All the circumstances
24 are considered in determining unreasonableness. (Law. Rev. Com.
25 Comment to C.C.P. Sec. 1671(b). A significant factor to be
26 considered is the bargaining power of the parties at the time the
27 liquidated damages clause was "agreed to." For this reason alone,
28 since the failure of the liquidated damages provision is

1 dispositive of the whole Armstrong IV case, CSI must produce the
2 requested documents. CSI's privacy rights as a corporation are
3 limited. CSI has identified none of the "others" for which is
4 alleging a right of privacy. Armstrong would agree that the use
5 of documents requested would be limited to this action.

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DATED: June 6, 1994

HUB LAW OFFICES



By: _____
FORD GREENE
Attorney for Defendant and
Cross-Complainant
GERALD ARMSTRONG